



August 27, 2024

To: Stakeholders for the Bear Valley Electrical Service, Inc. 2025 Wildfire Mitigation Plan Update

Enclosed is the Draft Decision of the Office of Energy Infrastructure Safety (Energy Safety), presenting its evaluation of the Bear Valley Electrical Service, Inc. 2025 Wildfire Mitigation Plan Update.

This Draft Decision is published for public review and comment. Opening comments must be submitted no later than September 16, 2024. Reply comments must be submitted no later than September 26, 2024.¹

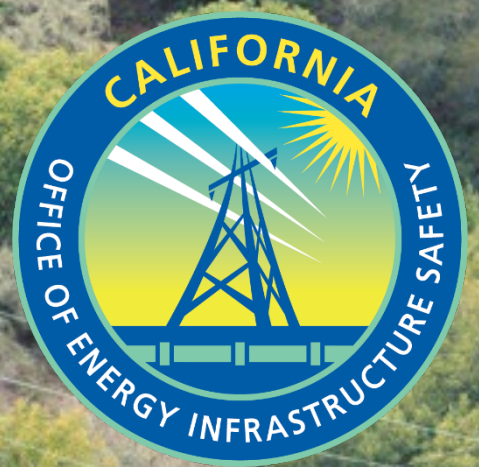
Comments must be submitted to Energy Safety's e-filing system in the 2023-2025 Wildfire Mitigation Plans docket (2023-2025-WMPs).²

Sincerely,

Tony Marino
Acting Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

¹ Dates falling on a Saturday or holiday as defined in Government Code Section 6700 have been adjusted to the next business day in accordance with Government Code Section 6707.

² Submit comments via the [2023-2025-WMPs docket](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs) on Energy Safety's e-filing system (<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>, accessed July 31, 2024).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

DRAFT DECISION

BEAR VALLEY ELECTRIC SERVICE, INC.

2025 WILDFIRE MITIGATION PLAN UPDATE

August 2024

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1. Executive Summary

The Office of Energy Infrastructure Safety (Energy Safety) works to ensure electrical corporations take effective actions to reduce utility-related wildfire risk.

This Decision approves Bear Valley Electric Service, Inc.'s (BVES's) 2025 Wildfire Mitigation Plan (WMP) Update, submitted on April 1, 2024.

In rendering this Decision Energy Safety considered and, in some cases, incorporated comments from stakeholders and members of the public.

BVES provided a total of 50 reportable updates in its 2025 WMP Update. These include two updates to risk models; 17 changes to targets, objectives, and projected expenditures; 14 changes to 2025 quarterly inspection targets; two new programs, and 14 reports on progress required for areas for continued improvement and one interim update.

The above-listed updates encompass five initiative categories. These include risk methodology and assessment; wildfire mitigation strategy development; grid design, operations, and maintenance; vegetation management and inspections; and situational awareness and forecasting.

Energy Safety evaluated BVES's 2025 WMP Update and finds several strengths. For example, BVES continued to integrate new technologies to improve its risk methodology, vegetation management assessments, and situational awareness. These technologies, such as advancing risk mapping through the addition of fire potential index, with quantitative data, integrated into existing modeling software, aim to improve Public Safety Power Shutoff protocols as well as mitigation selection. Further, BVES reported notable progress on the Radford Line upgrades, by securing the necessary permits with the United States Forest Service thus progressing a wildfire mitigation project on its highest risk circuit and only asset in a designated Tier 3 high fire threat district.

BVES also has areas of its WMP that can be further developed and improved. Overall, BVES has 10 areas for continued improvement for which it is required to demonstrate progress in its 2026-2028 Base WMP submittal. These include reporting on covered conductor project prioritization, processes for quality checks, evaluations of efficiencies found in new programs, and transparency in risk trade-off in risk mitigation selection.

2. Introduction and Background

Bear Valley Electric Service, Inc. (BVES) submitted its 2023-2025 Wildfire Mitigation Plan (2023-2025 Base WMP) in 2023.¹ Energy Safety approved BVES's 2023-2025 Base WMP on November 6, 2023. On April 1, 2024, BVES submitted its 2025 Wildfire Mitigation Plan Update (2025 WMP Update). On July 22, 2024, BVES submitted its revised 2025 WMP Update² to its 2023-2025 Base WMP in accordance with Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines (2025 WMP Update Guidelines)³ and Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (WMP Process Guidelines).⁴

On May 14, 2024, Energy Safety issued a Rejection and Order to Resubmit⁵ for the BVES 2025 WMP Update and received the resubmitted 2025 WMP Update⁶ on May 29, 2024.

Pursuant to Public Utilities Code section 8386.3(a), this Decision approves the BVES's 2025 WMP Update to its 2023-2025 Base WMP.

¹ In accordance with [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines \(December 6, 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true, accessed April 9, 2024).

² As discussed in Section 3.4, in response to Energy Safety's Notice on Errata for Bear Valley Electric Service, Inc. 2025 Wildfire Mitigation Plan Update, on July 22, 2024, BVES submitted, [Bear Valley Electric Service 2025 Wildfire Mitigation Plan Update Revision 2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true), [Bear Valley Electric Service 2023-2025 Wildfire Mitigation Plan 2025 Revision 2 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true), [Bear Valley Electric Service 2023-2025 Wildfire Mitigation Plan 2025 Revision 2 \(clean\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57056&shareable=true) (hereafter BVES's 2025 WMP Update (July 22, 2024), BVES's 2023-2025 Base WMP (redline) (July 22, 2024), and BVES's 2023-2025 Base WMP (clean) (July 22, 2024)) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true accessed, July 23, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57056&shareable=true accessed, July 23, 2024).

³ [Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true) (hereafter 2025 WMP Update Guidelines) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed May 6, 2024).

⁴ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\) \(adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true) (hereafter Revised WMP Process Guidelines) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true, accessed May 6, 2024).

⁵ [Rejection and Order to Resubmit for Bear Valley Electric Service, Inc 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56676&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56676&shareable=true, accessed July 8, 2024).

⁶ BVES Resubmission (May 29, 2024) ([Bear Valley Electric Service 2025 Wildfire Mitigation Plan Update Revision 1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56740&shareable=true), [Bear Valley Electric Service 2023-2025 Wildfire Mitigation Plan 2025 Revision 1 \[redlined\]](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56742&shareable=true), [Bear Valley Electric Service 2023-2025 Wildfire Mitigation Plan 2025 Revision 1 \[clean\]](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56741&shareable=true)) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56740&shareable=true, accessed July 1, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56742&shareable=true, accessed July 1, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56741&shareable=true, accessed July 1, 2024).

2.1 Consultation with California Department of Forestry and Fire Protection

The Office of the State Fire Marshal is part of the California Department of Forestry and Fire Protection (CAL FIRE). Public Utilities Code section 8386.3(a) requires Energy Safety to consult with the Office of the State Fire Marshal in reviewing electrical corporations' WMPs and WMP Updates. The Office of the State Fire Marshal provided consultation and input into Energy Safety's evaluation, but this Decision is an action of Energy Safety and not the Office of the State Fire Marshal or CAL FIRE.

2.2 Stakeholder Comments

Energy Safety invited stakeholders and members of the public to provide comments on the electrical corporations' 2025 WMP Updates and Revision Notices. Opening comments on BVES's 2025 WMP Update were due on May 7, 2024, and reply comments were due on May 17, 2024.

Energy Safety also accepted stakeholder comments on BVES's resubmitted 2025 WMP Update. Opening comments were due on the resubmitted 2025 WMP Update on June 10, 2024, and reply comments were due June 17, 2024.

Opening comments on BVES Notice on Errata were due on August 8, 2024.

See Appendix C for lists of stakeholders and members of the public who submitted comments, including a summary of comments Energy Safety concurred with and incorporated into its evaluation.

3. Energy Safety 2025 WMP Update Evaluation Process

Energy Safety issued the following guidelines for electrical corporations' 2025 WMP Updates:

- **2025 Wildfire Mitigation Plan Update Guidelines (January 2024)** (hereafter 2025 WMP Update Guidelines), which sets forth reportable updates and general instructions for each electrical corporation's 2025 WMP Update.
- **2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (Revised January 2024)** (hereafter WMP Process Guidelines), which outlines the process for Energy Safety's evaluation of WMPs, details the public participation process, and establishes submission requirements for the electrical corporations.
- **2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model (Revised January 2024)** and **2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey (Revised February 2024)** (hereafter Maturity Model and Maturity Survey), which together provide a quantitative method for assessing electrical corporation wildfire risk mitigation capabilities and examining how electrical corporations continue to improve in key areas of their WMPs.^{7, 8}

3.1 Reportable Updates

Energy Safety's 2025 WMP Update Guidelines delineate the following five categories of updates that the electrical corporations are required to report:⁹

1. Updates to risk models
2. Updates to approved targets, objectives, and projected expenditures¹⁰
3. Quarterly inspection targets for 2025 for vegetation management and asset inspections

⁷ [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model \(revised and adopted Jan. 2024, published Feb. 2024\) \(hereafter Maturity Model\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed May 6, 2024).

⁸ [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey \(adopted Jan. 2024, revised and published Feb. 2024\) \(hereafter Maturity Survey\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true>, accessed May 6, 2024).

⁹ [2025 WMP Update Guidelines](#), "Reportable Updates," p. 3

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed May 6, 2024).

¹⁰ Energy Safety's WMP evaluation and decision on a WMP is not an approval of, or agreement with, costs listed in the WMP.

4. New or discontinued programs
5. Progress on areas for continued improvement

The 2025 WMP Update Guidelines direct electrical corporations that they may not include any updates in their 2025 WMP Update that do not fall under one of these categories.¹¹

The 2025 WMP Update Guidelines further direct that if an electrical corporation does not have any updates that fall within any of the above categories, it must affirm that it has no reportable updates for 2025 and that the information provided in its 2023-2025 Base WMP is current and accurate.¹²

3.2 Maturity Model and Survey

Energy Safety used the Maturity Model¹³ and the electrical corporations' 2023 and 2024 responses to the Maturity Survey¹⁴ to assess the maturity of each electrical corporation's wildfire risk mitigation program.¹⁵

The Maturity Model consists of 37 individual capabilities describing the ability of electrical corporations to mitigate wildfire risk and Public Safety Power Shutoff (PSPS) risk within their service territory.¹⁶ The 37 capabilities are aggregated into 7 categories.¹⁷ Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). For each electrical corporation, Energy Safety calculated maturity levels for each capability, each category, five

¹¹ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed March 29, 2024).

¹² [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed March 29, 2024).

¹³ [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed May 6, 2024).

¹⁴ [Maturity Survey](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true, accessed May 6, 2024).

¹⁵ Energy Safety revised the 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model and Maturity Survey in January 2024. The revisions did not result in any changes to Maturity Survey questions, therefore the responses from 2024 are directly comparable to the responses from 2023. See the Maturity Survey issued by Energy Safety to the electrical corporations in 2023:

[Revised Final 2023 Electrical Corporation Wildfire Mitigation Maturity Survey \(April 24, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53708&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53708&shareable=true, accessed May 6, 2024)

¹⁶ [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true), Section 1, "Introduction" (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed April 9, 2024).

¹⁷ [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true), Section 3.1, "Capabilities and Categories" (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed April 9, 2024).

cross-category themes, and the overall WMP, based on the electrical corporation's answers to Maturity Survey questions and the scoring system described in the Maturity Model.¹⁸

Appendix E summarizes BVES's 2024 Maturity Survey results and changes in BVES's maturity compared to its 2023 Maturity Survey results.

3.3 Areas for Continued Improvement

Energy Safety's Decisions on the 2023-2025 Base WMPs focused on each electrical corporation's strategies for reducing the risk of utility-related ignitions. In those Decisions, Energy Safety identified areas where the electrical corporation must continue to improve its wildfire mitigation capabilities in future plans. For some areas, the electrical corporation was required to report its progress in its 2025 WMP Update. Energy Safety discusses the results of its evaluation of the electrical corporation's progress in each of those areas in Sections 5 through 9 of this Decision.

3.4 Errata

Energy Safety requested BVES submit a new version of its 2025 WMP Update and revised 2023-2025 Base WMP incorporating corrections to non-substantive and substantive errata identified by Energy Safety. In response, BVES submitted corrected versions of its 2025 WMP Update and revised 2023-2025 Base WMP on July 22, 2024.^{19, 20} The corrected versions fixed errors in the 2025 targets and objectives tables, provided justifications for projected expenditure changes, and resolved other copyediting errors.

Energy Safety considered BVES's corrected versions of its 2025 WMP Update and revised 2023-2025 Base WMP in its evaluation.

¹⁸ [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true), Section 4, "Maturity Level Determination" (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed April 9, 2024).

¹⁹ [Notice on Errata for BVES 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57028&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57028&shareable=true, accessed July 23, 2024).

²⁰ BVES Submission: [BVES's 2025 WMP Update \(July 22, 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true), [BVES's 2023-2025 Base WMP \(redlined\) \(July 22, 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true), [BVES's 2023-2025 Base WMP \(clean\) \(July 22, 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57056&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true accessed, July 23, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57056&shareable=true accessed, July 23, 2024).

3.5 Revision Notice

Public Utilities Code section 8386.3(a) states, “Before approval, [Energy Safety] may require modifications of the [WMP].” If Energy Safety requires modifications to a WMP, it does so by issuing a Revision Notice to an electrical corporation.²¹

Energy Safety did not issue BVES a Revision Notice for its 2025 WMP Update.

3.6 Decision

In its evaluation of an electrical corporation’s 2025 WMP Update, Energy Safety considers the information provided by the electrical corporation regarding its reportable updates and the associated justifications. Energy Safety’s approval of a 2025 WMP Update constitutes collective approval of the reported items in the electrical corporation’s 2025 WMP Update. The approval therefore authorizes the updates to the electrical corporation’s 2023-2025 Base WMP, as shown in the “Redlined 2023-2025 Base WMP” and “Clean Updated 2023-2025 Base WMP” provided as part of the electrical corporation’s 2025 WMP Update submission.²²

Energy Safety recognizes that planning for wildfire risk is a maturing capability and expects that electrical corporations will continue to improve year over year. Therefore, Energy Safety’s Decision includes areas for continued improvement, identifying areas where the electrical corporation must continue to mature in its capabilities.

BVES’s reportable updates reduce risk, increase efficiencies, and demonstrated a commitment to incorporating new technologies and continuing collaboration. Therefore, Energy Safety approves BVES’s 2025 WMP Update.

²¹ [Revised WMP Process Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true), Section 4.4, “Revision Notice,” pp. 6-8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true, accessed May 6, 2024).

²² [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), pp. 3-4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed March 29, 2024).

4. BVES 2025 WMP Update

In accordance with the 2025 WMP Update Guidelines,²³ BVES provided the following for its 2025 WMP Update submission:

1. **2025 WMP Update:** A standalone 2025 WMP Update document that describes BVES's reportable updates, or confirmation of no updates to the approved 2023-2025 Base WMP.
2. **Redlined 2023-2025 Base WMP:** A redlined version of BVES's 2023-2025 Base WMP showing reportable updates to the approved 2023-2025 Base WMP.
3. **Clean Updated 2023-2025 Base WMP:** A clean, updated copy of BVES's 2023-2025 Base WMP (i.e., without any updates marked in redline) incorporating the reportable updates from BVES's 2025 WMP Update as demonstrated in the redlined version.

Specifically, in response to the five categories of reportable updates of the 2025 WMP Update Guidelines, BVES provided the required information for each category. Energy Safety discusses each reportable update under the relevant mitigation initiative in Sections 5 through 9 of this Decision.

²³ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed May 6, 2024).

5. Overview of the Service Territory

In its 2025 WMP Update, BVES did not report any updates to the overview of the service territory section of its 2023-2025 Base WMP.

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6. Risk Methodology and Assessment

In its 2025 WMP Update, BVES reported significant risk model updates, as discussed below.²⁴

6.1 Risk Model Updates

BVES reported the following significant risk model updates:

- The development of two third-party modeling tools, which BVES is in the process of implementing. This includes updates to the following components of BVES’s wildfire risk model:
 - Ignition likelihood (including equipment, vegetation, and contact-from-object)
 - Wildfire spread likelihood
 - Wildfire hazard intensity
 - Wildfire exposure potential
 - Wildfire vulnerability
 - PSPS exposure potential
 - PSPS vulnerability

BVES also stated it intends to implement a Fire Potential Index (FPI) model as part of its operational decision-making.

Energy Safety finds that these updates meet the reportable update criteria set forth in the 2025 WMP Update Guidelines.²⁵

6.1.1 Energy Safety Evaluation

As a result of these significant risk model updates, BVES’s wildfire mitigation prioritization has not yet changed as BVES is still in the process of integrating and adopting these models and plans to do so by the third quarter of 2024.²⁶

²⁴ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 1, “Updates to Risk Models,” p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed May 6, 2024).

²⁵ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), “Reportable Updates,” p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed May 6, 2024).

²⁶ [BVES’s 2023-2025 Base WMP \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true) (July 22, 2024), p. 71 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true accessed, July 23, 2024).

Although not yet fully implemented, in response to these risk model updates, Energy Safety finds the updates could provide improvements for BVES's risk analysis. This includes integration of additional data when evaluating ignition likelihood, such as conductor characteristics, transformer condition, pole condition, and various vegetation characteristics.²⁷ Additionally, BVES's plan for integrating FPI potentially allows BVES to have greater clarity on variables impacting operational and PSPS decisions. This is due to added transparency on BVES's decision-making through its FPI and its various components.

6.1.2 Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for BVES in the risk methodology and assessment section. In its 2026-2028 Base WMP, BVES must report its progress on any existing areas for continued improvement specified in Energy Safety's Decision on BVES's 2023-2025 Base WMP.²⁸

6.2 2023 Areas for Continued Improvement

As required by Energy Safety's Decision on BVES's 2023-2025 Base WMP,²⁹ BVES reported its progress on three areas for continued improvement in the risk methodology and assessment section in its 2025 WMP Update.

6.2.1 BVES-23B-02.³⁰ PSPS and Wildfire Risk Trade-Off Transparency

In its Decision on BVES's 2023-2025 Base WMP, Energy Safety found that BVES did not provide enough transparency on how it balances the trade-offs between PSPS and wildfire risks when determining mitigation selection.³¹ As a result, BVES was required to describe how it

²⁷ [BVES's 2023-2025 Base WMP \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true) (July 22, 2024), Appendix B, pp. 464-468 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true accessed, July 23, 2024).

²⁸ Energy Safety's [Decision on Bear Valley Electric Service, Inc.'s 2023-2025 Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023) (hereafter referred to as Decision on BVES's 2023-2025 Base WMP), pp. 73-81 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

²⁹ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-75 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

³⁰ Energy Safety is instituting a new naming convention for its areas for continued improvement. Moving forward, areas for continued improvement identified in Energy Safety's evaluation of Base WMPs will be designated with a "B" and areas for continued improvement identified in Energy Safety's evaluation of WMP Updates will be designated with a "U." Accordingly, areas for continued improvement that were identified in Energy Safety's evaluation of 2023-2025 Base WMPs are retitled "23B" and new areas for continued improvement identified in Energy Safety's evaluation of 2025 Update WMPs herein are titled "25U."

³¹ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-74 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

prioritizes PSPS risks within its risk-based decisions, as well as how the rank order of its mitigation initiatives based on PSPS risk in comparison to wildfire risk.

In response, BVES stated wildfire risk as the main contributing factor for its risks and until recent new model inclusion it had limited availability to evaluate its PSPS risk.³² This is partially due to BVES not having had a PSPS event at the time of evaluation of the 2025 WMP Update.

BVES further stated with the additional models that have PSPS risk evaluation capabilities and FPI, it plans to determine utility risk using a combination of wildfire risk and PSPS risk.³³ The models were still under evaluation for full integration and implementation at the time of submission, therefore BVES does not have concrete details on how PSPS risk affects overall risk.

6.2.1.1 Energy Safety Evaluation

Given its dependence on new model implementation and further data tracking and analysis, BVES must continue to improve in this area and report how it has made additional progress in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for BVES, including the specific required progress that BVES must address in its 2026-2028 Base WMP.

6.2.2 BVES-23B-04. Cross-Utility Collaboration on Risk Model Development

In its Decision on BVES's 2023-2025 Base WMP, Energy Safety found that BVES and other investor-owned utilities (IOUs)³⁴ must continue participating in the Energy Safety-led risk modeling working group, as established by the 2021 WMP Action Statements.³⁵

³² [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

³³ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

³⁴ The IOUs include Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas and Electric Company (SDG&E), Bear Valley Electric Service (BVES), Liberty Utilities (Liberty), and PacifiCorp.

³⁵ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 74-75 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

In response, BVES discussed its continued participation in the risk modeling working group meetings. BVES noted that progress on this area for continued improvement resulted in reportable updates to its 2023-2025 Base WMP.³⁶

6.2.2.1 Energy Safety Evaluation

BVES sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in BVES's 2026-2028 Base WMP.

6.2.3 BVES-23B-05. Collaboration Between Vendor and Utility Risk Teams

In its Decision on BVES's 2023-2025 WMP, Energy Safety required BVES to demonstrate how it differentiates between activities completed by internal staff and vendor staff throughout risk modeling narratives in its 2025 WMP update.³⁷ This includes processes, procedures, methodologies, flow charts, schematics, and any explanations that describe collaboration with a risk modeling vendor. Additionally, BVES was asked to demonstrate how it identifies activities that require vendor discretion and state whether final approval from the BVES risk team is required, including any decisions such as mitigation selection. Energy Safety further asked BVES to indicate the source of the data, where a description of data is required, indicating whether the data are internally generated or vendor generated. If BVES could not indicate the source of the data, it must explain why.

In response, BVES provided clarification on its decision-making process. This includes describing how BVES provided asset information to two new third-party vendor models, along with local data such as Light Detecting and Ranging (LiDAR) inspection results and weather station parameters.³⁸ BVES stated that one of the models analyze fire risk, fire spread, and behavior.³⁹ A second model evaluates ignition risk, PSPS risk, and utility risk by integrating inputs from existing modeling programs, Wildfire Analyst Enterprise (WFA-E) and

³⁶ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

³⁷ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 75 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 31, 2024).

³⁸ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), pp. 15-16 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 31, 2024).

³⁹ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), pp. 15-16 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 31, 2024).

FPI.⁴⁰ This second model reportedly takes into account BVES asset conditions, customer locations, and types, including vulnerable customers.⁴¹

Relating to how BVES has internal approval or vendor discretion, BVES stated that its staff perform all risk modeling using vendor-supplied models and BVES inputs.⁴² Further, mitigation selection and PSPS decisions are made by BVES personnel based on modeling information.⁴³ BVES runs daily models to assess wildfire and PSPS risk, and this information is shared with the BVES management team.⁴⁴

BVES stated that two vendor companies for the new software technologies provided comprehensive training to its staff on model operation and understanding.⁴⁵ Lastly, BVES stated that progress on this area for continued improvement resulted in reportable updates to the 2023-2025 WMP.⁴⁶

6.2.3.1 Energy Safety Evaluation

Given the additional clarity on how BVES works with its vendors to develop its risk analysis and modeling, BVES sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in BVES's 2026-2028 Base WMP.

⁴⁰ [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 15-16
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 31, 2024).

⁴¹ [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 15-16
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

⁴² [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 15-16
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 31, 2024).

⁴³ [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 15-16
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 31, 2024).

⁴⁴ [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 15-16
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

⁴⁵ [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 15-16
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 31, 2024).

⁴⁶ [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 15-16
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

7. Wildfire Mitigation Strategy Development

In its 2025 WMP Update, BVES provided two total updates related to the wildfire mitigation strategy development section of its 2023-2025 Base WMP. The updates BVES provided related to this section included reporting progress on two areas for continued improvement.

7.1 2023 Areas for Continued Improvement

As required by Energy Safety's Decision on BVES's 2023-2025 Base WMP,⁴⁷ BVES reported its progress on two areas for continued improvement in the wildfire mitigation strategy development section in its 2025 WMP Update.

7.1.1 **BVES-23B-03. Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety**

In its Decision on BVES 2023-2025 Base WMP, Energy Safety found that BVES did not make substantive efforts to collaborate with other IOUs⁴⁸ in the areas of climate change forecasts in consequence modeling, community vulnerability in consequence modeling, and utility vegetation management for wildfire safety.⁴⁹

Accordingly, Energy Safety required BVES to participate in all Energy Safety-organized activities related to best practices for:⁵⁰

- Inclusion of climate change forecasts in consequence modeling.
- Inclusion of community vulnerability in consequence modeling.

⁴⁷ [Decision on BVES 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-81 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

⁴⁸ The IOUs include Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas and Electric Company (SDG&E), Bear Valley Electric Service (BVES), Liberty Utilities (Liberty), and PacifiCorp.

⁴⁹ [Decision on BVES 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 32 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 22, 2024).

⁵⁰ [Decision on BVES 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 74 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 22, 2024).

- Utility vegetation management for wildfire safety.

Energy Safety also required BVES to collaborate with the other IOUs on the above-mentioned best practices.⁵¹ Energy Safety required BVES to provide a status update on any cross-utility collaboration on the topics listed above, including a list of any resulting changes to its WMP since its 2023-2025 Base WMP.⁵²

BVES stated its continued participation in Energy Safety-sponsored scoping meetings and other relevant workshops as required, such as the Energy Safety-led risk modeling working group meetings.⁵³ BVES stated that it participated in bi-monthly Joint IOU meetings⁵⁴ hosted by PG&E, SDG&E, or SCE.^{55, 56} The agenda included WMP topics such as areas for continued improvements and associated remedies, benchmarking, and change orders.⁵⁷

7.1.1.1 Energy Safety Evaluation

The 2023 area for continued improvement directed all the IOUs to collaborate. The IOUs include SDG&E, PG&E, and SCE, but also include BVES, Liberty Utilities, and PacifiCorp. While BVES demonstrated the first step by participating in the meetings hosted by PG&E, SDG&E, and SCE, it should additionally document and report any WMP-related collaboration with Liberty and PacifiCorp. Accordingly, in its 2026-2028 Base WMP, BVES must document and report on its WMP-related collaboration efforts with Liberty and PacifiCorp where relevant and appropriate to each IOU's interests.

Energy Safety has modified the area for continued improvement to provide additional guidance for BVES. BVES must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

⁵¹ [Decision on BVES 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 74 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 22, 2024).

⁵² [Decision on BVES 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 74 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 22, 2024).

⁵³ [BVES 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 14 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁵⁴ [BVES 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 14 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁵⁵ [Data Request OEIS-P-WMP 2024-BVES-004](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56843&shareable=true), Question 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56843&shareable=true, accessed July 8, 2024).

⁵⁶ [Data Request OEIS-P-WMP 2024-BVES-004](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56843&shareable=true), Question 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56843&shareable=true, accessed July 8, 2024).

⁵⁷ [Data Request OEIS-P-WMP 2024-BVES-004](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56843&shareable=true), Question 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56843&shareable=true, accessed July 8, 2024).

Section 11 provides all areas for continued improvement for BVES, including the specific required progress that BVES must address in its 2026-2028 Base WMP.

7.1.2 BVES-23B-06. Vendor Fire Risk Model Implementation Milestones and Dates

In its 2023-2025 Base WMP, BVES stated that it is adopting a new risk modeling platform. BVES's previous risk modeling relied on static fire threat maps⁵⁸ and modeling its risk at the circuit level.⁵⁹ BVES stated this new platform should be able to update fire threat maps more frequently⁶⁰ and enable a more granular risk modeling.⁶¹ However, BVES did not include "a clearly defined schedule for this transition."⁶² Accordingly, in its 2023 Decision Energy Safety required BVES to report in its 2025 Update how it expects its new vendor risk modeling software to improve its risk analysis, and provide a plan with milestones and dates for achieving those improvements.⁶³

In its 2025 WMP Update, BVES explained both the modifications to its existing models and details on its transition to new models.⁶⁴ BVES stated that it used a third-party vendor risk model, Wildfire Risk Reduction Model (WRRM), in February 2023 to create a baseline map of BVES's service territory with no grid hardening implemented.⁶⁵ BVES then ran the model again in November 2023 to incorporate BVES grid hardening initiatives,⁶⁶ and included the

⁵⁸ [Decision on BVES 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 2 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

⁵⁹ [Decision on BVES 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 2 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

⁶⁰ [Decision on BVES 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 31 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

⁶¹ [Decision on BVES 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

⁶² [Decision on BVES 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 31 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

⁶³ [Decision on BVES 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 75 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

⁶⁴ [BVES 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 16 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁶⁵ [BVES 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 16 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁶⁶ [BVES 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 16 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

updated maps as an attachment to its 2025 WMP Update.⁶⁷ BVES stated it will continue updating its model throughout the remainder of 2024.⁶⁸

Additionally, BVES included the Energy Safety-requested timeline with milestones and dates for achieving improvements to its vendor risk modeling software. This timeline appears as Table 6-7 in BVES's 2025 WMP Update,⁶⁹ and includes dates through fiscal quarter 4 of 2024. BVES stated that it is currently on track to meet all targets listed in Table 6-7.⁷⁰

7.1.2.1 Energy Safety Evaluation

BVES provided the requested explanation for its risk modeling software modifications and a timeline with milestones for improvements to its risk modeling software. BVES sufficiently responded to this area for continued improvement. No further reporting is required on this area for continued improvement in BVES's 2026-2028 Base WMP.

7.2 New or Discontinued Programs

In its 2025 WMP Update, BVES did not report any new or discontinued programs related to the wildfire mitigation strategy development section of its 2023-2025 Base WMP.

7.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, BVES did not report any updates to approved targets, objectives, or projected expenditures related to the wildfire mitigation strategy development section of its 2023-2025 Base WMP.

⁶⁷ [BVES 2025 WMP Update](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 16 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁶⁸ [BVES 2023-2025 Base WMP \(redlined\)](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true) (July 22, 2024), Table 6-7, pp. 88-90 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true, accessed July 23, 2024).

⁶⁹ [BVES 2023-2025 Base WMP \(redlined\)](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true) (July 22, 2024), Table 6-7, pp. 88-90 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true, accessed July 23, 2024).

⁷⁰ [Data Request OEIS-P-WMP 2024-BVES-005](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56871&shareable=true), Question 1 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56871&shareable=true, accessed July 8, 2024).

8. Wildfire Mitigation Initiatives

This section provides Energy Safety's evaluation of BVES's reportable updates related to the following wildfire mitigation initiatives:

- Grid design, operations, and maintenance, including grid design and system hardening, asset inspections, equipment maintenance and repair, and grid operations and procedures
- Vegetation management and inspections
- Situational awareness and forecasting
- Emergency preparedness
- Community outreach and engagement

Energy Safety discusses its evaluation of BVES's reportable updates related to PSPS in Section 9. Energy Safety includes discussion of any reportable updates affecting BVES's process for continuous improvement in Section 10.

8.1 Grid Design, Operations, and Maintenance

In its 2025 WMP Update, BVES provided 24 total updates related to the grid design and system hardening section of its 2023-2025 Base WMP. The updates BVES provided related to this section included reporting required progress on seven areas for continued improvement, and reporting updates to six approved targets, four objectives, and seven projected expenditures.

8.1.1 Grid Design and System Hardening

8.1.1.1 2023 Areas for Continued Improvement

As required by Energy Safety's Decision on BVES's 2023-2025 Base WMP,⁷¹ BVES reported its progress on four areas for continued improvement in the grid design and system hardening section in its 2025 WMP Update.

BVES-23B-07. Risk Informed Prioritization of Grid Hardening Installation

In its Decision on BVES's 2023-2025 WMP, Energy Safety required BVES to explain how it is focusing its covered conductor and other grid hardening projects in the areas of highest risk based on the most recent and available WRRM output in its 2026-2028 Base WMP.⁷²

⁷¹ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

⁷² [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 75-76 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 31, 2024).

BVES stated that it will provide an update on its progress for this area for continued improvement in its 2026-2028 Base WMP.⁷³

BVES-23B-08. Covered Conductor Mitigation Selection

In its Decision on BVES's 2023-2025 WMP, Energy Safety required BVES to demonstrate how it compares alternative initiatives, mitigations, and combinations of mitigations to covered conductor, and to provide the analyses used for such comparisons in its 2026-2028 Base WMP.⁷⁴

BVES stated that it will provide an update on its progress for this area for continued improvement in its 2026-2028 Base WMP.⁷⁵

BVES-23B-09. Radford Line Project

In its Decision on BVES's 2023-2025 WMP, Energy Safety required BVES to provide a status update on the completion of the Radford line project in its 2025 Update.⁷⁶ This update required BVES to include how it planned to expedite construction after receiving a permit from the United States Forest Service (USFS) and provide a threshold date by which time the lack of a permit would delay completion of the project past 2023. If securing a permit from USFS continues to delay the project, BVES needed to provide an update on how it has been working with the USFS to expedite completion of the permit, including a description of all interactions BVES has had with USFS regarding permit issuance. Additionally, BVES was required to provide plans on how it will reduce impacts and delays for any similar hardening projects moving forward.

In response, BVES reported obtaining approval to proceed from the USFS on January 3, 2024.⁷⁷ The Radford line project commenced in May 2024, with an anticipated completion date by the end of 2024. BVES submitted a copy of its USFS Permit to Energy Safety.⁷⁸ Lastly,

⁷³ [BVES's 2025 WMP Update](#) (July 22, 2024), p. 17
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

⁷⁴ [Decision on BVES's 2023-2025 Base WMP](#) (November 6, 2023), p. 76
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true>, accessed July 31, 2024).

⁷⁵ [BVES's 2025 WMP Update](#) (July 22, 2024), p. 17
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

⁷⁶ [Decision on BVES's 2023-2025 Base WMP](#) (November 6, 2023), p. 76
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true>, accessed July 31, 2024).

⁷⁷ [BVES's 2025 WMP Update](#) (July 22, 2024), p. 18
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 31, 2024).

⁷⁸ [BVES's 2025 WMP Update](#) (July 22, 2024), Attachment 2, pp. 1-12
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

BVES stated that progress on this area for continued improvement did not result in a reportable update to the 2023-2025 WMP.⁷⁹

Energy Safety Evaluation

BVES obtained the USFS permit and reported the Radford Line Project will be completed by the end of 2024.⁸⁰ BVES did not provide any additional measures to expedite the project's progress as the permit was obtained in January 2024 and no construction delays or further USFS permits for this project were anticipated.⁸¹ In terms of similar projects, BVES stated it may have future work that falls under a "Linear Infrastructure Utility Permit" which involves maintenance work.⁸² To reduce potential delays on future projects, BVES stated it will plan for longer lead times to engage with and apply for USFS permits, building capacity for delays into timelines, potentially hiring a permitting consultant to facilitate the USFS permit process, as well as developing an on-going working relationship with USFS staff.⁸³

Given the issuance of the USFS permit which resulted in BVES forecasting completion of the project by the end of 2024, and the BVES reported process improvements for obtaining permits, BVES sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in BVES's 2026-2028 Base WMP.

BVES-23B-10. Grid Hardening Pilots

In its Decision on BVES's 2023-2025 WMP, Energy Safety required BVES to explain its specific process for monitoring pilot programs being performed by IOUs in its 2025 Update. This explanation was required to include BVES's plan and criteria on how and when to decide which technologies to select, including the dates of meetings held where BVES conferred with IOUs on piloted technologies and specifics on which technologies were discussed. Additionally, BVES was to provide an update on its assessments of technologies being explored by IOUs, including specifics Distribution Fault Anticipation (DFA), Early Fault Detection (EFD), and Rapid Earth Fault Current Limiters (REFCL). The update should detail why and how BVES is moving forward with any such technologies, including an analysis of feasibility and barriers for implementation, and the risk mitigation benefits.

⁷⁹ [BVES's 2025 WMP Update](#) (July 22, 2024), p. 18
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

⁸⁰ [BVES's 2025 WMP Update](#) (July 22, 2024), p. 18
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

⁸¹ Data Request OEIS-P-WMP 2024-BVES-002, Question 2 Attachment
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56544&shareable=true>, accessed August 7, 2024).

⁸² Data Request OEIS-P-WMP_2024-BVES-007, Question 1
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57114&shareable=true>, accessed August 1, 2024).

⁸³ Data Request OEIS-P-WMP_2024-BVES-007, Question 1
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57114&shareable=true>, accessed August 1, 2024).

In response, BVES reported its participation in the WMP Joint IOU workshops, where discussions on new technologies such as DFA, EFD, and REFCL were held. BVES determined REFCL is applicable only to grounded systems, while BVES's 34KV sub-transmission is a delta system, rendering REFCL incompatible with the BVES grid.⁸⁴

BVES stated that it initiated a pilot program to install an Online Diagnostic System, using continuous monitor sensors to provide actionable grid insights.⁸⁵ This system, similar to DFA and EFD, was installed on one circuit in 2022, expanded to two circuits in 2023, and is planned for installation on an additional circuit in 2024. The system is designed to detect irregularities due to potential hardware failures and identify objects such as vegetation contacting the lines, aiding BVES in preemptively addressing potential ignition sources.⁸⁶

BVES stated that in 2023 it launched a second pilot program in partnership with Green Grid Inc., installing a camera system on poles to continuously monitor the pole and associated lines.⁸⁷ Cameras were installed on two different circuits.⁸⁸

Energy Safety Evaluation

While the new technologies being implemented by the other IOUs are not compatible with BVES's grid system, BVES did implement two pilot programs relating to grid hardening that will provide similar data to those being pursued by the other IOUs. As a result, BVES sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in BVES's 2026-2028 Base WMP.

8.1.1.2 New or Discontinued Programs

In its 2025 WMP Update, BVES did not report any new or discontinued programs related to grid design and system hardening section of its 2023-2025 Base WMP.

8.1.1.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, BVES reported updates to approved targets, objectives, and projected expenditures related to the grid design and system hardening section of its 2023-

⁸⁴ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), pp. 18-19 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁸⁵ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), pp. 18-19 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 31, 2024).

⁸⁶ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), pp. 18-19 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁸⁷ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 19 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 31, 2024).

⁸⁸ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 19 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

2025 Base WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

Specifically, BVES provided a decrease in its 2025 target for covered conductor installations from 12.9 to 5.1 miles as well as a decrease in its projected capital expenditure from \$4,655,694 to \$1,840,623.⁸⁹ BVES stated that in 2023 it surpassed its initial projection for covered conductor installations and that it plans to meet its target for covered conductor installation in 2024, and therefore provided a reduction to its covered conductor for 2025.⁹⁰

BVES provided a decrease in its 2025 target for distribution pole replacements and reinforcements from 200 to 100 poles as well as a decrease in its projected capital expenditure from \$2,789,368 to \$788,838.⁹¹ BVES stated that in 2023 it surpassed its initial projection for distribution pole replacements and reinforcements and that it plans to meet its target for this initiative in 2024, and therefore provided a reduction to its target for this initiative for 2025.⁹²

BVES provided an increase in its projected capital expenditure for its energy storage and solar generating facility project (GD_10) from \$0 to \$13,578,409.⁹³ BVES reported the project was not initially scheduled for completion until after 2025, but due to progression with the permitting process, is now possible for completion in 2025.⁹⁴

BVES provided an increase in its projected capital expenditures for its Bear Valley Energy Storage Facility project (GD_11) from \$0 to \$10,342,009.⁹⁵ BVES reported the project was not set for completion until after 2025, but now that permitting is initiated, the project will be completed in 2025.⁹⁶

⁸⁹ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), pp. 6 and 9 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁹⁰ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁹¹ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 9 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁹² [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁹³ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 9 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁹⁴ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 10 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 31, 2024).

⁹⁵ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 9 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

⁹⁶ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 10 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 31, 2024).

BVES provided an increase in its projected capital expenditure for its Maltby Substation (GD_22) from \$0 to \$1,777,479.⁹⁷ BVES reported that the substation was originally scheduled for completion in 2024, but due to delays in delivery of some of the substation equipment, has been rescheduled for 2025.⁹⁸

BVES provided a decrease in its projected capital expenditure for its Lake Substation (GD_23) from \$2,065,781 to \$0 as well as an updated objective completion date from 2025 to 2026.⁹⁹ BVES stated that its reprogramming of the substation initiatives is a result of work loading and planning constraints, with higher priority initiatives consuming more planning resources than initially projected. Additionally, BVES stated that its substation equipment delivery is delayed by 12 to 15 months due to supply chain issues.¹⁰⁰

BVES provided a decrease in its projected capital expenditure for its Village Substation (GD_24) from \$1,144,054 to \$0 as well as an updated objective completion date from 2025 to 2027.¹⁰¹ BVES stated that its reprogramming of the substation initiatives is a result of work loading and planning constraints, with higher priority initiatives consuming more planning resources than initially projected. Additionally, BVES stated that its substation equipment delivery is delayed by 12 to 15 months due to supply chain issues.¹⁰²

Energy Safety Evaluation

BVES stated it reduced the covered conductor and pole replacement targets due to exceeding its targets set in 2023. In 2023, BVES set a covered conductor installation goal of 12.9 miles and stated that it completed 20.7 miles, 7.8 miles beyond its target.¹⁰³ Additionally, BVES set a pole replacement goal of 200 replacements and stated that it completed 309 in 2023, reportedly exceeding its goal by 109 replacements.¹⁰⁴ These accounts are equivalent to the

⁹⁷ [BVES's 2025 WMP Update](#) (July 22, 2024), p. 9
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

⁹⁸ [BVES's 2025 WMP Update](#) (July 22, 2024), p. 10
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 31, 2024).

⁹⁹ [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 8-9
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

¹⁰⁰ [BVES's 2025 WMP Update](#) (July 22, 2024), p. 8
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

¹⁰¹ [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 8-9
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

¹⁰² [BVES's 2025 WMP Update](#) (July 22, 2024), p. 8
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

¹⁰³ [BVES's 2023 Q4 Quarterly Data Report \(QDR\)](#), Table 1, Row 11
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true>, accessed July 23, 2024).

¹⁰⁴ [BVES's 2023 Q4 Quarterly Data Report \(QDR\)](#), Table 1, Row 44
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true>, accessed July 23, 2024).

associated reductions provided by BVES for 2025, as BVES provided a reduction to its 2025 covered conductor target from 12.9 to 5.1, or by 7.8 miles, and its pole replacement targets from 200 to 100, or by 100 replacements. Therefore, provided BVES meets its 2024 and 2025 targets for these initiatives, the total amount of covered conductor miles installed and poles replaced or reinforced from 2023 through 2025 will remain greater than or equal to the 3-year totals of the targets initially approved in BVES's 2023-2025 Base WMP.

BVES provided additional information listing two microgrid projects with original completion dates expected beyond 2025; however, BVES revised the project timelines of the two microgrid projects to be completed by 2025 due to initiation of environmental review permitting taking less time than expected.¹⁰⁵ This adjusted timeline required BVES to change projected expenditures.¹⁰⁶

For the Maltby substation project, BVES stated planned upgrades for 2024 will not be completed until 2025 due to delays in receiving necessary substation equipment.¹⁰⁷

BVES also reported similar supply chain delays and resource constraints for the Lake and Village substation projects resulting in decreased projected expenditure for 2025. Though these delays result in a decreased risk reduction for the 2023-2025 timeframe, BVES included updated completion dates and justification for why the projects cannot be completed by 2025.

Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for BVES in grid design and system hardening. In its 2026-2028 Base WMP, BVES must report its progress on any existing areas for continued improvement specified in Energy Safety's Decision on BVES's 2023-2025 Base WMP.¹⁰⁸

¹⁰⁵ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 10 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹⁰⁶ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 10 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹⁰⁷ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 10 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹⁰⁸ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-81 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

8.1.2 Asset Inspections

8.1.2.1 2023 Areas for Continued Improvement

As required by Energy Safety's Decision on BVES's 2023-2025 Base WMP,¹⁰⁹ BVES reported its progress on three areas for continued improvement in the asset inspections section in its 2025 WMP Update.

BVES-23B-11. Covered Conductor Inspections and Maintenance

In its Decision on BVES's 2023-2025 Base WMP, Energy Safety required BVES to discuss how its inspection programs will address failure modes unique to covered conductor such as water intrusion, splice cover missing or damaged, and surface damage.¹¹⁰

In its response, BVES stated it discussed water intrusion with covered conductor manufacturers and is developing a strategy for addressing this issue.¹¹¹ BVES also stated that covered conductor manufacturers recommended inspections check for discoloration, bubbling and separation of outer coating, and abrasions that penetrate the covered conductor coating.¹¹² BVES stated it will update its inspection checklists to include these items.¹¹³

Energy Safety Evaluation

While BVES committed to updating its inspection checklists to include conditions specific to covered conductor surface damage and splice covers and developing a strategy to address water intrusion, it has not provided a timeline for completing these commitments. In its 2026-2028 Base WMP, BVES must provide a timeline for achieving both commitments. If BVES already completed both commitments at the time of its 2026-2028 Base WMP, it must provide its inspection checklists as attachments to its submission.

¹⁰⁹ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-81 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

¹¹⁰ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 77 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 31, 2024).

¹¹¹ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 19-20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹¹² [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 19-20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹¹³ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 19-20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

Energy Safety has modified the area for continued improvement to provide additional guidance for BVES. BVES must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for BVES, including the specific required progress that BVES must address in its 2026-2028 Base WMP.

BVES-23B-12. Distribution Detailed Inspection Frequency

In its Decision on BVES's 2023-2025 Base WMP, Energy Safety required BVES to strive to adopt a risk-based approach to distribution detailed inspections.¹¹⁴ BVES was required to outline a plan to update its inspections in higher risk areas, including an analysis to determine new inspection frequencies, a description of how higher risk areas were prioritized based on risk, updates to inspection checklists to account for assets posing greater wildfire risk, and a plan to obtain workforce if necessary to perform additional inspections.¹¹⁵ BVES was required to provide information demonstrating its existing inspection programs adequately address risk if it elected not to issue a plan to shift to risk based inspections.¹¹⁶

In its response, BVES stated it will revise its detailed inspection program in its 2026-2028 base WMP to increase the frequency of inspections on its highest risk assets.¹¹⁷ BVES stated all assets in its territory exhibit similar risk profiles, but circuit risk profiles will change as covered conductor is installed.¹¹⁸ BVES stated it plans to increase inspection frequency on the highest risk bare wire assets.¹¹⁹

BVES stated in 2023, its unmanned aerial vehicle (UAV) photography inspection program identified one level 1 condition,¹²⁰ which BVES stated was immediately remediated, and no level 1 conditions were found during detailed, patrol, LiDAR, UAV thermography or third-party

¹¹⁴ [Decision on BVES's 2023-2025 Base WMP](#) (November 6, 2023), pp. 77-78 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true>, accessed July 31, 2024).

¹¹⁵ [Decision on BVES's 2023-2025 Base WMP](#) (November 6, 2023), p. 78 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true>, accessed July 31, 2024).

¹¹⁶ [Decision on BVES's 2023-2025 Base WMP](#) (November 6, 2023), p. 78 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true>, accessed July 31, 2024).

¹¹⁷ [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 20-22 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

¹¹⁸ [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 20-22 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

¹¹⁹ [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 20-22 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

¹²⁰ Level 1 (Condition): Immediate safety and/or reliability risk with high probability for significant impact. Take action immediately, either by fully repairing the condition, or by temporarily repairing and reclassifying the condition to a lower priority. [Go 95 Rule 18 \(ca.gov\)](#).

patrol inspections.¹²¹ BVES stated the lack of level 1 findings identified by its detailed distribution inspection program suggest its current detailed inspection policy adequately addresses risk.

Energy Safety Evaluation

BVES provided the required outline and information demonstrating adequacy of its inspection program to address risk. Given the only level 1 finding BVES identified in 2023 was the result of its UAV photography inspection program, which BVES is continuing, BVES sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in BVES's 2026-2028 Base WMP.

BVES-23B-13. Asset Inspection QA/QC Program

In its Decision on BVES's 2023-2025 Base WMP, Energy Safety required BVES to demonstrate progress toward implementing a comprehensive quality assurance and quality control (QA/QC) program for each of its asset inspection programs. BVES was required to create written procedures, standardized inspection forms, and written QA/QC procedures for each of its inspection programs.¹²² BVES was also required to create a system for timestamping and filing photographs taken during inspections.¹²³ Additionally, BVES was required to provide inspection sample size, verification methods, pass rate targets, and actual pass rates.¹²⁴

In its response, BVES stated written procedures are available for each of its asset inspections.¹²⁵ Additionally, BVES stated it created written QA/QC procedures for detailed, patrol, UAV thermography, UAV photography/video, LiDAR, intrusive pole, and substation inspections.¹²⁶ BVES stated that timestamped photographs related to inspections can be

¹²¹ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), pp. 22-23 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹²² [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 78-79 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 31, 2024).

¹²³ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 78-79 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 31, 2024).

¹²⁴ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 78-79 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 31, 2024).

¹²⁵ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), pp. 22-23 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹²⁶ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), pp. 22-23 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

stored in one of three systems.¹²⁷ BVES did not provide the sample size, pass rate targets, or actual pass rates for its QA/QC activities.

Energy Safety Evaluation

In its 2025 WMP Update, BVES created written QA/QC procedures for each of its asset inspection types. Upon review of these procedures, Energy Safety found the BVES QA process does not require inspection audits or track inspection pass rates. The QA process does not establish minimum audit sample size or pass rate targets. In its 2026-2028 Base WMP, BVES must update its written QA process to include annual audits, specify audited sample size, require audits be performed by an individual other than the original inspector, and track audit pass rates.

Energy Safety has modified the area for continued improvement to provide additional guidance for BVES. BVES must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for BVES, including the specific required progress that BVES must address in its 2026-2028 Base WMP.

8.1.2.2 New or Discontinued Programs

In its 2025 WMP Update, BVES did not report any new or discontinued programs related to the Asset Inspection section of its 2023-2025 Base WMP.

8.1.2.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, BVES provided quarterly targets (end of Q2 and end of Q3) for eight of its 2025 asset inspection programs, as required by the 2025 WMP Update Guidelines.¹²⁸

Energy Safety Evaluation

BVES's quarterly targets for its 2025 asset management inspections are consistent with quarterly targets for 2023 and 2024 and meet the requirements of the 2025 WMP Update Guidelines.

Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for BVES in asset inspections related to targets, objectives, and projected expenditures. In its 2026-2028 Base WMP, BVES

¹²⁷ [BVES's 2025 WMP Update](#) (July 22, 2024), pp. 22-23 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true>, accessed July 23, 2024).

¹²⁸ [2025 WMP Update Guidelines](#), see Section 3 for Quarterly Inspection Targets for 2025 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed April 9, 2023).

must report its progress on any existing areas for continued improvement specified in Energy Safety's Decision on BVES's 2023-2025 Base WMP.¹²⁹

8.1.3 Equipment Maintenance and Repair

8.1.3.1 2023 Areas for Continued Improvement

As required by Energy Safety's Decision on BVES's 2023-2025 Base WMP,¹³⁰ BVES reported its progress on one area for continued improvement in the equipment maintenance and repair section in its 2025 WMP Update.

BVES-23B-14. Non-Exempt Surge Arrester Replacement

In its Decision on BVES's 2023-2025 Base WMP, Energy Safety required BVES to provide its plan to identify and replace non-exempt lightning/surge arresters.¹³¹ BVES was required to report the number of lightning/surge arresters replaced in 2023, the target to replace in 2024, and the estimated completion date of the project.¹³²

In its response, BVES stated it replaced 43 non-exempt arresters in 2023 and is targeting the replacement of 58 non-exempt arresters in 2024.¹³³ BVES stated that it plans to replace the remaining 173 non-exempt arresters by the end of 2026.¹³⁴

Energy Safety Evaluation

Since BVES provided the required numbers, targets, and estimates related to non-exempt lightning/surge arresters, BVES sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in BVES's 2026-2028 Base WMP.

¹²⁹ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-81 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

¹³⁰ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-81 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

¹³¹ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 79 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 31, 2024).

¹³² [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 79 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 31, 2024).

¹³³ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 23 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹³⁴ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 23 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

8.1.3.2 New or Discontinued Programs

In its 2025 WMP Update, BVES did not report any new or discontinued programs related to the Equipment Maintenance and Repair section of its 2023-2025 Base WMP.

8.1.3.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, BVES did not report any updates to approved targets, objectives, or projected expenditures related to the equipment maintenance and repair section of its 2023-2025 Base WMP.

8.1.4 Grid Operations and Procedures

8.1.4.1 2023 Areas for Continued Improvement

As required by Energy Safety's Decision on BVES's 2023-2025 Base WMP,¹³⁵ BVES reported its progress on one area for continued improvement in the grid operations and procedures section in its 2025 WMP Update.

BVES-23B-15. Reliability Impacts of Fast Trip Settings

In its Decision on BVES's 2023-2025 Base WMP, Energy Safety required BVES to provide information on outages that occurred while fast trip settings were enabled.¹³⁶ BVES was required to report impacted circuits, impacted circuit segments, cause of outage, number of customers impacted, number of vulnerable customers impacted, outage duration, outage response time, and customer minutes of interruption.¹³⁷

In its response, BVES clarified it uses manufacturer recommended fast trip settings that follow a traditional time-current curve.¹³⁸ BVES provided a table with the required outage information.¹³⁹ BVES stated it plans to contract a consultant in 2024 to evaluate the BVES

¹³⁵ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-81 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

¹³⁶ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 79-80 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 31, 2024).

¹³⁷ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 79-80 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 31, 2024).

¹³⁸ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), pp. 23-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹³⁹ [2025 WMP Update Attachment for BVES-23-15 BVES 2023: Outage Log](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56400&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56400&shareable=true, accessed July 3, 2024)

device setting policy and provide recommendations to reduce the likelihood of wildfire ignition.¹⁴⁰

Energy Safety Evaluation

Although BVES stated it plans to hire a consultant in 2024 to evaluate and provide recommendations related to its device settings, BVES does not commit to implementing or reporting on the recommendations. In its 2026-2028 Base WMP, BVES must provide a complete list of recommendations offered by the consultant, a timeline for the incorporation of each recommendation, and justification for any recommendations BVES does not plan to adopt.

Energy Safety has modified the area for continued improvement to provide additional guidance for BVES. BVES must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for BVES, including the specific required progress that BVES must address in its 2026-2028 Base WMP.

8.1.4.2 New or Discontinued Programs

In its 2025 WMP Update, BVES did not report any new or discontinued programs related to the grid operations and procedures section of its 2023-2025 Base WMP.

8.1.4.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, BVES did not report any updates to approved targets, objectives, or projected expenditures related to the grid operations and procedures section of its 2023-2025 Base WMP.

8.2 Vegetation Management and Inspections

In its 2025 WMP Update, BVES provided eight updates related to the vegetation management and inspections section of its 2023-2025 Base WMP. The updates BVES provided related to this section included reporting progress on one area for continued improvement, one new program, and quarterly targets for six 2025 vegetation management inspection programs.

¹⁴⁰ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), pp. 23-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

8.2.1 2023 Areas for Continued Improvement

Energy Safety's Decision on BVES's 2023-2025 Base WMP¹⁴¹ did not require BVES to report progress on any areas for continued improvement in the vegetation management and inspections section in its 2025 WMP Update. However, BVES reported intermediate progress on one area for continued improvement in its 2025 WMP Update.

8.2.1.1 BVES-23B-16. Vegetation Management Quality Control Personnel Qualifications.

In its Decision on BVES's 2023-2025 Base WMP, Energy Safety required BVES to present a plan in its 2026-2028 Base WMP to improve the utility vegetation management-related qualifications of its quality control (QC) check personnel.¹⁴² In its 2025 WMP Update, BVES elected to provide intermediate progress towards meeting this area for continued improvement.¹⁴³ BVES reported that it now requires a certified arborist to conduct vegetation management QC checks.¹⁴⁴

Energy Safety Evaluation

Energy Safety appreciates BVES's elective interim update on this area for continued improvement. In accordance with the requirements of BVES-23B-16, BVES must also report its continued progress on this area for continued improvement in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for BVES, including the specific required progress that BVES must address in its 2026-2028 Base WMP.

8.2.2 New or Discontinued Programs

In its 2025 WMP Update, BVES reported creating one new program related to the vegetation management and inspections section of its 2023-2025 Base WMP. Energy Safety finds that this update meets the reportable update criteria set forth in the 2025 WMP Update Guidelines.

This new program is a satellite-based inspection of vegetation near electrical assets using a proprietary, third-party software platform. According to BVES, this software provides insights

¹⁴¹ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-81 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

¹⁴² [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 80 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

¹⁴³ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹⁴⁴ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

for annual planning including identification of possible grow-in and fall-in risks, tree health, and vegetation growth forecasting.

8.2.2.1 Energy Safety Evaluation

In response to BVES's reported new program, as summarized above, Energy Safety finds that this program may further reduce the risk of ignition from vegetation contact by identifying grow-in and fall-in risk that may not be identified through other inspection methods.

8.2.2.2 Areas for Continued Improvement

BVES must continue to improve in the following areas and report its progress in its 2026-2028 Base WMP.

BVES-25U-05. Vegetation Management Remote Sensing Evaluation

This satellite-based inspection adds to BVES's vegetation inspection portfolio that already includes detailed inspections, two annual patrol inspections, an annual UAV HD Photograph/Videography,¹⁴⁵ and an annual LiDAR inspection. Notably, the satellite, UAV, and LiDAR inspections all assess possible grow-in risks through remote sensing.

BVES's use of this software platform is in its infancy, having conducted only one satellite-based inspection of its service territory using the software platform.¹⁴⁶ As BVES uses this software platform further and its satellite-based inspection matures, BVES should continue to consider resource use efficiency and effectiveness of its various remote sensing methods for vegetation management.

Section 11 provides all areas for continued improvement for BVES, including the specific required progress that BVES must address in its 2026-2028 Base WMP.

8.2.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, BVES provided quarterly targets (end of Q2 and end of Q3) for its six 2025 vegetation management inspection programs, as required by the 2025 WMP Update Guidelines.¹⁴⁷

¹⁴⁵ Unmanned Aerial Vehicle High-Definition Photograph/Videography

¹⁴⁶ [Data Request OEIS-P-WMP_2024-BVES-004](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56843&shareable=true), Question 1 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56843&shareable=true, accessed July 2, 2024).

¹⁴⁷ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), See Section 3 for Quarterly Inspection Targets for 2025 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed April 9, 2023).

8.2.3.1 Energy Safety Evaluation

BVES's quarterly targets for its 2025 vegetation management inspections are consistent with quarterly targets for 2023 and 2024 and meet the requirements of the 2025 WMP Update Guidelines.

8.2.3.2 Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for BVES in vegetation management and inspections related to targets, objectives, and projected expenditures. In its 2026-2028 Base WMP, BVES must report its progress on any existing areas for continued improvement specified in Energy Safety's Decision on BVES's 2023-2025 Base WMP.¹⁴⁸

8.3 Situational Awareness and Forecasting

In its 2025 WMP Update, BVES provided two total updates related to the situational awareness and forecasting section of its 2023-2025 Base WMP. The updates BVES provided related to this section included reporting required progress on two areas for continued improvement and one new program.

8.3.1 2023 Areas for Continued Improvement

As required by Energy Safety's Decision on BVES's 2023-2025 Base WMP,¹⁴⁹ BVES reported its progress on two areas for continued improvement in the situational awareness and forecasting section in its 2025 WMP Update.

8.3.1.1 BVES-23B-17. Weather Station Maintenance and Calibration

In its Decision on SCE's 2023-2025 Base WMP, Energy Safety required that BVES continue to maintain and keep a log of all the annual maintenance and calibration for each weather station, including the station name, location, conducted maintenance, in compliance with BVES's Weather Station Calibration Checklist.¹⁵⁰ Energy Safety required that the document also include the length of time from initiation of a repair ticket to completion and the corrective maintenance performed to bring the station back into functioning condition.¹⁵¹

¹⁴⁸ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-81 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

¹⁴⁹ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-81, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

¹⁵⁰ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023) p. 80-81, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

¹⁵¹ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023) p. 80-81, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

Specifically, Energy Safety required BVES submit with its 2025 WMP Update documentation indicating the number of weather stations that received their annual calibration, and the number of stations that were unable to undergo annual maintenance and/or calibration due to factors such as remote location, weather conditions, customer refusals, environmental concerns, and safety issues.¹⁵² Energy Safety required the documentation to include: station name and location, the reason that maintenance and/or calibration, the length of time since the maintenance and calibration, and the number of attempts made to complete the maintenance and calibration.¹⁵³

BVES provided Energy Safety a log of its weather station maintenance for 2023 and 2024. BVES additionally stated it has a plan moving forward for periodic records reviews.¹⁵⁴

Energy Safety Evaluation

BVES provided the required documentation, therefore BVES sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in BVES 2026-2028 Base WMP.

8.3.1.2 BVES-23B-18. Fire Potential Index

BVES reported development and implementation of an FPI through a third-party vendor by the end of 2023. However, BVES's 2023-2025 Base WMP lacked specific details concerning the development, validation, or implementation of its future FPI.

Specifically, Energy Safety required BVES to submit with its 2025 WMP Update documentation that it: specify the inputs and the data sources used to calculate its FPI, describe the methodology and threshold values for varying fire potential levels, describe how the FPI will be used in its daily operations and how it plans to validate the predictions measuring against actual wildfire events, discuss any planned improvements or future updates on its FPI.¹⁵⁵

BVES stated it introduced new third-party vendor risk modeling technology to incorporate FPI specified to its service territory parameters with descriptions of the data inputs,

¹⁵² [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023) p. 81, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

¹⁵³ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 26 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹⁵⁴ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 26 and Attachment 5: BVES-23-17 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹⁵⁵ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), p. 81 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

methodology, and validation in its 2023-2025 Base WMP (redlined).¹⁵⁶ BVES described threshold values and the integration of FPI into its decision making for various mitigation including PSPS.¹⁵⁷ Further, BVES stated it will continue evaluating its use and benefits of the model.¹⁵⁸

Energy Safety Evaluation

Since BVES provided required details regarding the development, integration, validation, and evaluation of FPI, BVES sufficiently responded to all areas for continued improvement; no further reporting is required on this area for continued improvement in BVES's 2026-2028 Base WMP.

8.3.2 New or Discontinued Programs

In its 2025 WMP Update, BVES reported creating one new program related to the situational awareness and forecasting section of its 2023-2025 Base WMP. Energy Safety finds that this update meets the reportable update criteria set forth in the 2025 WMP Update Guidelines.

BVES began a pilot program using the GreenGrid iSIU¹⁵⁹ System. The iSIU System operates as a camera-based infrastructure inspection and monitoring device automated to alert field personnel of potential hazards.¹⁶⁰ BVES stated it will provide a status report on the iSIU system in its 2026-2028 Base WMP.

8.3.2.1 Energy Safety Evaluation

In response to BVES's reported new program, as summarized above, Energy Safety finds that this program may provide early warning of hazards events. Further, BVES stated this program is still in a pilot phase and committed to deciding on the expanding the program in 2026-2028 Base WMP.¹⁶¹

¹⁵⁶ [BVES 2023-2025 Base WMP \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true) (July 22, 2024), pp. 65-68 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true, accessed July 23, 2024).

¹⁵⁷ [BVES's 2023-2025 Base WMP \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true) (July 22, 2024), pp. 65-68 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true, accessed July 23, 2024).

¹⁵⁸ [BVES's 2023-2025 Base WMP \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true) (July 22, 2024), pp. 65-68 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true, accessed July 23, 2024).

¹⁵⁹ Instant Situational Insights™ for Utilities

¹⁶⁰ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 12 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

¹⁶¹ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (July 22, 2024), p. 12 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed July 23, 2024).

8.3.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, BVES did not report any updates to approved targets, objectives, or projected expenditures related to the situational awareness and forecasting section of its 2023-2025 Base WMP.

8.4 Emergency Preparedness

In its 2025 WMP Update, BVES did not report any updates to the emergency preparedness section of its 2023-2025 Base WMP.

8.5 Community Outreach and Engagement

In its 2025 WMP Update, BVES did not report any updates to the community outreach and engagement section of its 2023-2025 Base WMP.

9. Public Safety Power Shutoff

In its 2025 WMP Update, BVES did not report any updates to the Public Safety Power Shutoff section of its 2023-2025 Base WMP.

DRAFT

10. BVES Process for Continuous Improvement

BVES did not indicate any changes to the lessons learned or corrective action program sections of its 2023-2025 Base WMP.

DRAFT

11. Required Areas for Continued Improvement

Energy Safety's WMP evaluations focus on each electrical corporations' strategies for reducing the risk of utility-related ignitions. The list below comprises all BVES's areas for continued improvement and the required progress that BVES must address in its 2026-2028 Base WMP. This includes areas for continued improvement from Energy Safety's Decision on BVES's 2023-2025 Base WMP as well as new areas for continued improvement from Energy Safety's evaluation of BVES's 2025 WMP Update, as discussed in Sections 5 through 9 of this Decision.

11.1 Cross-Category

- **BVES-23B-01. Target Verification Methods**
 - Description: BVES lists "quantitative" for its targets' verification method. It is not clear from this word how BVES will provide to verify progress toward and achievement of the target.
 - Required Progress: In its 2026-2028 Base WMP, BVES must include all methods used to verify progress of year-to-year targets within the table. BVES must clearly articulate its verification methods that are effective for supporting progress on and achievement of each target.
 - Discussed in Section 8.1, "Grid Design, Operations, and Maintenance"; Section 8.2, "Vegetation Management and Inspections"; Section 8.3, "Situational Awareness and Forecasting"; Section 8.5, "Community Outreach and Engagement," of Energy Safety's Decision on BVES's 2023-2025 Base WMP.¹⁶²

11.2 Risk Methodology and Assessment

- **BVES-23B-02. PSPS and Wildfire Risk Trade-Off Transparency**
 - Description: BVES does provide adequate transparency regarding PSPS and wildfire risk trade-offs, or how it uses risk ranking and risk buy-down to determine risk mitigation selection.
 - Required Progress: In its 2026-2028 Update, BVES must describe:

¹⁶² [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-74 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

- How it prioritizes PSPS risk in its risk-based decisions, including trade-offs between wildfire risk and PSPS risk.
- How the rank order of its planned mitigation initiatives compares to the rank order of mitigation initiatives ranked by risk buy-down estimate, along with an explanation for any instances where the order differs.
- Discussed in Section 6, “Risk Methodology and Assessment”.

11.3 Wildfire Mitigation Strategy Development

- **BVES-25U-01. (BVES-23-03) Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety**
 - Description: BVES participated in past Energy Safety-sponsored scoping meetings on these topics and began attending meetings hosted by PG&E, SDG&E, and SCE on other WMP-related topics. However, BVES has not reported on any WMP-related collaboration with Liberty Utilities and PacifiCorp in its 2025 WMP Update.
 - Required Progress: In its 2026-2028 Base WMP, BVES must continue collaborating with PG&E, SDG&E, and SCE. BVES must also document any WMP-related collaboration with Liberty and PacifiCorp. BVES must document how all its collaboration efforts with the IOUs impact WMP Initiatives in the 2026-2028 Base WMP.
 - BVES must also continue to participate in all Energy Safety Safety-organized activities related to best practices for:
 - Inclusion of climate change forecasts in consequence modeling.
 - Inclusion of community vulnerability in consequence modeling.
 - Utility vegetation management for wildfire safety.
 - Discussed in Section 7, “Wildfire Mitigation Strategy Development”.

11.4 Grid Design, Operations, and Maintenance

- **BVES-23B-07. Risk Informed Prioritization of Grid Hardening Installation**
 - Description: BVES’s current covered conductor scope does demonstrate proper decision-making considerations regarding project prioritization.
 - Required Progress: In its 2026-2028 Base WMP, BVES must:

- Explain how it is focusing its covered conductor and other grid hardening projects in the areas of highest risk based on the most recent and available WRRM output.
 - Adjust its targets as needed based on its analysis.
 - Discussed in Section 8.1.1, “Grid Design and System Hardening.”
- **BVES-23B-08. Covered Conductor Mitigation Selection**
 - Description: BVES’s current covered conductor scope does not demonstrate proper decision-making considerations regarding mitigation selection.
 - Required Progress: In its 2026-2028 Base WMP, BVES must:
 - Demonstrate how it compares alternative initiatives, mitigations, and combinations of mitigations to covered conductor, and provide the analyses used for such comparisons.
 - Adjust its targets as needed based on its analysis.
 - Discussed in Section 8.1.1, “Grid Design and System Hardening.”
- **BVES-25U-02. (BVES-23-11) Covered Conductor Inspections and Maintenance**
 - Description: In its 2025 WMP Update, BVES committed to updating its inspection checklists to include checks specific to covered conductor and developing a strategy to address water intrusion. BVES did not provide a timeline for completing these commitments.
 - Required Progress: In its 2026-2028 Base WMP, BVES must provide:
 - A timeline for including covered conductor surface damage checks in its inspection processes.
 - A timeline for developing a strategy to address water intrusion and including water intrusion checks in its inspection processes.

If BVES has reached the final milestone of both required timelines at the time of its 2026-2028 Base WMP submission, it must provide the inspection checklists as attachments to its WMP submission.
 - Discussed in Section 8.1.2, “Asset Inspections.”
- **BVES-25U-03. (BVES-23-13) Asset Inspection QA/QC Program**
 - Description: In Energy Safety’s decision on BVES’s 2023-2025 WMP Base Plan, Energy Safety required BVES to establish written QA/QC procedures for each of its inspection types. BVES established written QA procedures, but the QA procedures do not include inspection audits.

- Required Progress: In its 2026-2028 Base WMP, BVES must update its written QA procedures for each inspection type. The written process must:
 - Include annual audits.
 - Specify a statistically relevant sample size to audit.
 - Require audits be performed by a person/persons other than the original inspector.
 - Track audit pass rates.
- Discussed in Section 8.1.2, “Asset Inspections.”
- **BVES-25U-04. (BVES-23-15) Device Setting Improvement**
 - Description: In its 2025 Update, BVES stated it plans to engage a consultant to evaluate device settings and provide improvement recommendations. BVES did not commit to implementing or reporting on the recommendations.
 - Required Progress: In its 2026-2028 Base WMP, BVES must provide:
 - A complete list of recommendations provided by the consultant.
 - A timeline for the incorporation of each recommendation.
 - Justification for any recommendations BVES does not plan to adopt.
 - Discussed in Section 8.1.4, “Grid Operations and Procedures.”

11.5 Vegetation Management and Inspections

- **BVES-23B-16. Vegetation Management Quality Control Personnel Qualifications**
 - Description: In its response to BVES-22-16, Vegetation Management Quality Control Personnel Qualifications, BVES has not demonstrated that it has considered alternative staffing for its vegetation management quality control checks. BVES has not shown that it has properly identified trained and qualified personnel for its vegetation quality control checks.
 - Required Progress: In its 2026-2028 Base WMP, BVES must:
 - Present a plan to improve the utility vegetation management-related qualifications of its QC check personnel.
 - Explain and provide the decision-making process on its consideration of alternative staffing for its vegetation management QC checks, including consideration of employing or contracting with certified arborists or registered professional foresters to perform these checks.
 - Discussed in Section 8.2, “Vegetation Management and Inspections.”

- **BVES-25U-05. Vegetation Management Remote Sensing Evaluation**

- Description: As BVES's use of satellite-based inspection matures, BVES should continue to consider resource-use efficiency and effectiveness of its various remote sensing methods for vegetation management.
- Required Progress: In its 2026-2028 Base WMP, BVES must:
 - List the data outputs from its satellite and LiDAR inspections.
 - Describe how BVES will use those data outputs to improve vegetation management-related outcomes over the 2026-2028 WMP cycle.
 - Evaluate and compare the costs, benefits, and effectiveness of using:
 - Ground-based inspections.
 - LiDAR with ground-based inspections.
 - Satellite-based inspections with ground-based inspections.
 - LiDAR and satellite-based inspections with ground-based inspections.
- Discussed in Section 8.2, "Vegetation Management and Inspections."

12. Conclusion

BVES's 2025 WMP Update is approved.

Catastrophic wildfires remain a serious threat to the health and safety of Californians. Electrical corporations, including BVES, must continue to make progress toward reducing utility-related ignition risk.

Energy Safety expects BVES to effectively implement its wildfire mitigation activities to reduce the risk of utility-related ignitions and the potential catastrophic consequences if an ignition occurs, as well as to reduce the scale, scope, and frequency of PSPS events.

BVES must meet the commitments in its WMP and fully address the areas for continued improvement identified within this Decision to ensure it meaningfully reduces utility-related ignition and PSPS risk within its service territory over the plan cycle.

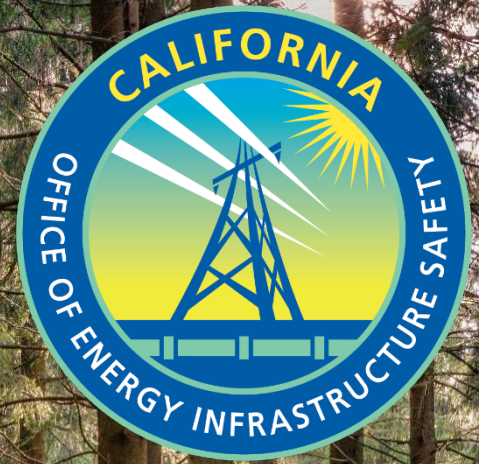
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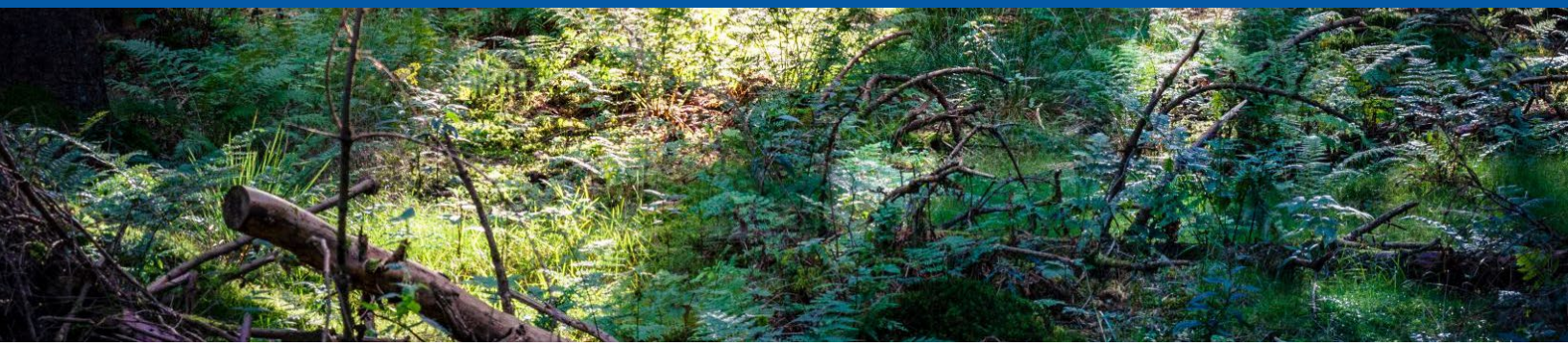


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APPENDICES



APPENDICES

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Appendix A.

Glossary of Terms

Term	Definition
AFN	Access and functional needs
BVES	Bear Valley Electric Service
CAISO	California Independent System Operator
Cal Advocates	The Public Advocates Office at the California Public Utilities Commission
CAL FIRE	California Department of Forestry and Fire Protection
Cal OES	California Governor's Office of Emergency Services
CAP	Corrective action program
CBO	Community-based organization
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEJA	California Environmental Justice Alliance
CNRA	California Natural Resources Agency
CPUC	California Public Utilities Commission
D.	Prefix to a proceeding number designating a CPUC decision
DR	Data request
DWR	California Department of Water Resources
EBMUD	East Bay Municipal Utility District
EFD	Early fault detection

Term	Definition
EPUC	Energy Producers and Users Coalition
EVM	Enhanced vegetation management
FERC	Federal Energy Regulatory Commission
FPI	Fire potential index
FWI	Fire weather index
GFN	Ground-fault neutralizers
GIS	Geographic information systems
GO	General order
GPI	Green Power Institute
GRC	General rate case
HD	High definition
HFRA	High Fire Risk Area
HFTD	High fire threat district
HWT or Horizon West	Horizon West Transmission
I.	Prefix to a proceeding number designating a CPUC Order Instituting Investigation (OII)
ICS	Incident command system or structure
IOU	Investor-owned utility
IR	Infrared
ISA	International Society of Arboriculture
ITO	Independent transmission operator
kV	Kilovolt

Term	Definition
Liberty	Liberty Utilities
LiDAR	Light detection and ranging
Maturity Model	Electrical Corporation Wildfire Mitigation Maturity Model
Maturity Survey	Electrical Corporation Wildfire Mitigation Maturity Survey
MAVF	Multi-attribute value function
MBL	Medical Baseline
MGRA	Mussey Grade Road Alliance
ML	Machine learning
NDVI	Normalized difference vegetation index
NERC	North American Electric Reliability Corporation
NFDRS	National Fire Danger Rating System
NOD	Notice of defect
NOV	Notice of violation
OCM	Overhead circuit miles
OEIS or Energy Safety	Office of Energy Infrastructure Safety
PG&E	Pacific Gas and Electric Company
PoF	Probability of failure
PoI	Probability of ignition
PRC	Public Resources Code
PSPS	Public Safety Power Shutoff

Term	Definition
Pub. Util. Code or PU Code	Public Utilities Code
QA	Quality assurance
QC	Quality control
QDR	Quarterly Data Report
R.	Prefix to a proceeding number designating a CPUC rulemaking
RAMP	Risk Assessment and Mitigation Phase
RCRC	Rural County Representatives of California
REFCL	Rapid earth fault current limiter
RFW	Red Flag Warning
RSE	Risk-spend efficiency
SAWTI	Santa Ana Wildfire Threat Index
SCADA	Supervisory control and data acquisition
SCE	Southern California Edison Company
SDG&E	San Diego Gas & Electric Company
S-MAP	Safety Model Assessment Proceeding, now the Risk-Based Decision-Making Framework Proceeding
SMJU	Small and multijurisdictional utilities
TAT	Tree Assessment Tool
TBC	Trans Bay Cable
TURN	The Utility Reform Network
USFS	United States Forest Service
VM	Vegetation management

Term	Definition
VRI	Vegetation risk index
WMP	Wildfire Mitigation Plan
WRRM	Wildfire Risk Reduction Model
WSAB	Wildfire Safety Advisory Board
WUI	Wildland-urban interface

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Appendix B.

Status of 2023 Areas for Continued Improvement

Energy Safety's 2023 Decision¹ for BVES identified areas for continued improvement and associated required progress. Areas for continued improvement are where BVES must continue to improve its wildfire mitigation capabilities. As part of the 2025 WMP Update evaluation process, Energy Safety reviewed the progress reported by BVES on areas for continued improvement that Energy Safety required progress on by the 2025 WMP Update. Energy Safety is not satisfied that BVES has made sufficient progress in all the identified areas for continued improvement.

BVES's 2023 areas for continued improvement that Energy Safety required progress on by the 2025 WMP Update are listed in Table A-1. The status column indicates whether each has been fully addressed. If not, the column notes where to find more information in this Decision.

¹ [Decision on BVES's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true) (November 6, 2023), pp. 73-75 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55945&shareable=true, accessed July 12, 2024).

Table A-1. BVES 2023 Areas for Continued Improvement

ID	Title	Status
BVES-23B-02 (BVES-23-02)	PSPS and Wildfire Risk Trade-Off Transparency	BVES sufficiently addressed the required progress thus far; Energy Safety will continue to monitor progress. For related areas for continued improvement, see Sections 6 and 11 of this Decision.
BVES-25U-01 (BVES-23-03)	Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety	BVES did not sufficiently address the required progress. For related areas for continued improvement, see Sections 7 and 11 of this Decision.
BVES-23B-04 (BVES-23-04)	Cross-Utility Collaboration on Risk Model Development	BVES sufficiently addressed the required progress.
BVES-23B-05 (BVES-23-05)	Collaboration Between Vendor and Utility Risk Teams	BVES sufficiently addressed the required progress.
BVES-23B-06 (BVES-23-06)	Vendor Fire Risk Model Implementation Milestones and Dates	BVES sufficiently addressed the required progress.
BVES-23B-09 (BVES-23-09)	Radford Line Project	BVES sufficiently addressed the required progress.
BVES-23B-10 (BVES-23-10)	Grid Hardening Pilots	BVES sufficiently addressed the required progress.

ID	Title	Status
BVES-25U-02 (BVES-23-11)	Covered Conductor Inspections and Maintenance	BVES did not sufficiently address the required progress. For related areas for continued improvement, see Sections 8.1.3 and 11 of this Decision.
BVES-23B-12 (BVES-23-12)	Distribution Detailed Inspection Frequency	BVES sufficiently addressed the required progress.
BVES-25U-03 (BVES-23-13)	Asset Inspection QA/QC Program	BVES did not sufficiently address the required progress. For related areas for continued improvement, see Sections 8.1.6 and 11 of this Decision.
BVES-23B-14 (BVES-23-14)	Non-Exempt Surge Arrester Replacement	BVES sufficiently addressed the required progress.
BVES-25U-04 (BVES-23-15)	Device Setting Improvement (Reliability Impacts of Fast Trip Settings)	BVES did not sufficiently address the required progress. For related areas for continued improvement, see Sections 8.1.8 and 11 of this Decision.
BVES-23B-17 (BVES-23-17)	Weather Station Maintenance and Calibration	BVES sufficiently addressed the required progress.
BVES-23B-18 (BVES-23-18)	Fire Potential Index	BVES sufficiently addressed the required progress.

Appendix C.

Stakeholder Comments on the 2025 WMP Updates

Energy Safety invited stakeholders, including members of the public, to provide comments on the electrical corporations' 2025 WMP Updates. Opening comments on Group 1 WMPs were due on May 7, 2024, and reply comments were due on May 21, 2024.² Energy also invited stakeholders to provide comments on BVES's resubmitted 2025 WMP Updates (Revision 1 and Revision 2)^{3,4} as a result of Energy Safety's Rejection and Order to Resubmit⁵ as well as Energy Safety's Notice on Errata.⁶ Opening comments following the Rejection and Order to Resubmit were due June 10, 2024, and reply comments were due June 17, 2024. Comments following the Notice on Errata were due August 5, 2024. Energy Safety did not receive any comments on BVES's resubmitted 2025 WMP Updates (Revisions 1 and 2). The following individuals and

² The reply comment period for Group 1 electrical corporations' 2025 WMP Updates was extended from May 17, 2024, to May 21, 2024. See Energy Safety's [Deadline Extension for 2025 Wildfire Mitigation Plan Update Reply Comments \(May 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56689&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56689&shareable=true, accessed June 11, 2024).

³ [BVES's 2025 WMP Update, Revision 1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56740&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56740&shareable=true, accessed August 6, 2024); [BVES's Redlined 2023-2025 Base WMP, Revision 1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56742&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56742&shareable=true, accessed August 6, 2024); [BVES's Clean Updated 2023-2025 Base WMP, Revision 1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56741&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56741&shareable=true, accessed August 6, 2024).

⁴ [BVES's 2025 WMP Update, Revision 2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57055&shareable=true, accessed August 6, 2024); [BVES's Redlined 2023-2025 Base WMP, Revision 2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57057&shareable=true, accessed August 6, 2024); [BVES's Clean Updated 2023-2025 Base WMP, Revision 2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57056&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57056&shareable=true, accessed August 6, 2024).

⁵ Energy Safety [Rejection and Order to Resubmit for Bear Valley Electric Service, Inc. 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56676&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56676&shareable=true, accessed July 30, 2024).

⁶ Energy Safety [Notice on Errata for Bear Valley Electric Service, Inc. 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57028&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57028&shareable=true, accessed July 30, 2024).

organizations submitted comments on BVES's initial 2025 WMP Update submission (R0) that Energy Safety considered in this Decision:

- California Department of Fish and Wildlife (CDFW)
- The Public Advocates Office at the California Public Utilities Commission (Cal Advocates)

Comments received on the 2023-2025 WMPs can be viewed in the 2023-2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log.

Energy Safety concurred with and incorporated the following stakeholder comments into Energy Safety's findings on BVES's 2025 WMP Update:

- Cal Advocates commented that Energy Safety require BVES to:
 - Implement a more thorough quality control program for asset inspections.
 - Develop a program of fast-trip settings.
 - Update its PSPS procedures to include thresholds based on its new fire potential index (FPI).

Appendix D. Stakeholder Comments on the Draft Decision

This appendix will contain Energy Safety's summary of stakeholder comments on Energy Safety's draft Decision on BVES's 2025 WMP Update.

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Appendix E.

Maturity Survey Results

Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model⁷ (Maturity Model) and Electrical Corporation Wildfire Mitigation Maturity Survey⁸ (Maturity Survey) together provided a quantitative method to assess the maturity of each electrical corporation's wildfire risk mitigation program.

The Maturity Model consists of 37 individual capabilities describing the ability of electrical corporations to mitigate wildfire risk within their service territory. The 37 capabilities are aggregated into seven categories. The seven mitigation categories are:

- A. Risk Assessment and Mitigation Selection
- B. Situational Awareness and Forecasting
- C. Grid Design, Inspections, and Maintenance
- D. Vegetation Management and Inspections
- E. Grid Operations and Protocols
- F. Emergency Preparedness
- G. Community Outreach and Engagement

Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). Electrical corporations' responses to the Maturity Survey, listed by mitigation category, are depicted in the figures and tables below.

Figure A-1 displays BVES's 2024 response to the Maturity Survey across mitigation categories showing minimum and average values. Figure A-2 compares BVES's 2024 response to the Maturity Survey to its 2023 response to the Maturity Survey, depicting values that increased, decreased, or had no change (indicated by "NC").

⁷ [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model \(revised and adopted Jan. 2024, published Feb. 2024\)](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed May 6, 2024).

⁸ [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey \(adopted Jan. 2024, revised and published Feb. 2024\)](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true>, accessed May 6, 2024).

Figure A-1. BVES 2024 Response to the 2023-2025 Maturity Survey

		1. Capability				2. Capability				3. Capability				4. Capability				5. Capability				6. Capability				
		2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	
A. Risk Assessment and Mitigation Strategy		1. Statistical weather, climate, and wildfire modeling				2. Calculation of wildfire and PSPS risk exposure for societal values				3. Calculation of community vulnerability to wildfire and Public Safety Power Shutoffs (PSPS)				4. Calculation of risk and risk components				5. Risk event tracking and integration of lessons learned				6. Risk-informed wildfire mitigation strategy				
	Minimum of Sub-Cap.	0.0	0.0	2.0	2.0	1.0	2.0	2.0	2.0	1.0	2.0	2.0	2.0	0.0	0.0	2.0	2.0	2.0	3.0	3.0	3.0	3.0	1.0	3.0	3.0	3.0
	Average of Sub-Cap.	2.2	2.9	3.4	3.4	3.3	3.4	3.4	3.4	3.5	3.6	3.6	3.6	2.8	3.1	3.7	3.7	2.8	3.6	3.9	3.9	3.9	2.8	3.8	3.9	3.9
B. Situational Awareness and Forecasting		7. Ignition likelihood estimation				8. Weather forecasting ability				9. Wildfire spread forecasting				10. Data collection for near-real-time conditions				11. Wildfire detection and alarm systems				12. Centralized monitoring of real-time conditions				
	Minimum of Sub-Cap.	1.0	2.0	2.0	2.0	1.0	2.0	2.0	2.0	0.0	0.0	0.0	0.0	2.0	2.0	2.0	2.0	1.0	1.0	1.0	1.0	0.0	0.0	0.0	4.0	
	Average of Sub-Cap.	3.3	3.3	3.3	3.3	3.2	3.2	3.2	3.2	2.0	2.6	2.6	2.6	3.6	3.7	3.7	3.7	2.7	3.0	3.0	3.0	3.2	3.2	3.2	4.0	
C. Grid Design, Inspections, and Maintenance		13. Asset inventory and condition database				14. Asset inspections				15. Asset maintenance and repair				16. Grid design and resiliency				17. Asset and grid personnel training and quality								
	Minimum of Sub-Cap.	1.0	1.0	3.0	3.0	1.0	1.0	3.0	3.0	1.0	1.0	2.0	2.0	1.0	1.0	2.0	2.0	1.0	1.0	4.0	4.0					
	Average of Sub-Cap.	2.5	2.5	3.8	3.8	3.0	3.0	3.7	3.7	2.3	2.3	3.0	3.0	2.8	2.8	3.3	3.3	3.3	3.3	4.0	4.0					
D. Vegetation Management and Inspections		18. Vegetation inventory and condition database				19. Vegetation inspections				20. Vegetation treatment				21. Vegetation personnel training and quality												
	Minimum of Sub-Cap.	1.0	4.0	4.0	4.0	1.0	4.0	4.0	4.0	2.0	2.0	2.0	2.0	0.0	0.0	3.0	3.0									
	Average of Sub-Cap.	3.0	4.0	4.0	4.0	2.0	4.0	4.0	4.0	3.3	3.5	3.5	3.5	2.5	3.0	3.8	3.8									
E. Grid Operations and Protocols		22. Protective equipment and device settings				23. Incorporation of ignition risk factors in grid control				24. PSPS operating model				25. Protocols for PSPS re-energization				26. Ignition prevention and suppression								
	Minimum of Sub-Cap.	0.0	0.0	0.0	1.0	1.0	1.0	1.0	1.0	1.0	2.0	4.0	4.0	1.0	1.0	1.0	1.0	1.0	3.0	4.0	4.0					
	Average of Sub-Cap.	2.2	2.2	2.7	3.3	2.4	2.4	3.0	3.0	3.3	3.7	4.0	4.0	2.8	3.2	3.3	3.3	1.7	3.7	4.0	4.0					
F. Emergency Preparedness		27. Wildfire and PSPS emergency and disaster preparedness plan				28. Collaboration and coordination with public safety				29. Public emergency communication strategy				30. Preparedness and planning for service restoration				31. Customer support in wildfire and PSPS emergencies				32. Learning after wildfires and PSPS incidents				
	Minimum of Sub-Cap.	4.0	4.0	4.0	4.0	1.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	0.0	0.0	0.0	0.0	1.0	1.0	1.0	4.0	1.0	1.0	1.0	1.0	
	Average of Sub-Cap.	4.0	4.0	4.0	4.0	2.5	3.0	3.0	3.0	3.5	3.5	3.7	3.7	3.0	3.0	3.0	3.0	1.0	1.0	1.0	4.0	1.5	1.5	1.5	1.5	
G. Community Outreach and Engagement		33. Public outreach and education awareness				34. Public engagement in electrical corporation wildfire mitigation planning				35. Engagement with AFN and socially vulnerable populations				36. Collaboration on local wildfire mitigation planning				37. Cooperation and best practice sharing with other electrical corporations								
	Minimum of Sub-Cap.	3.0	3.0	4.0	4.0	4.0	4.0	4.0	4.0	1.0	4.0	4.0	4.0	3.0	3.0	4.0	4.0	1.0	1.0	4.0	4.0					
	Average of Sub-Cap.	3.5	3.5	4.0	4.0	4.0	4.0	4.0	4.0	2.3	4.0	4.0	4.0	3.0	3.5	4.0	4.0	2.3	3.0	4.0	4.0					

Figure A-2. BVES Maturity Survey Changes from 2023 to 2024

		1. Capability				2. Capability				3. Capability				4. Capability				5. Capability				6. Capability			
		2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026
A. Risk Assessment and Mitigation Strategy		1. Statistical weather, climate, and wildfire modeling				2. Calculation of wildfire and PSPS risk exposure for societal values				3. Calculation of community vulnerability to wildfire and Public Safety Power Shutoffs (PSPS)				4. Calculation of risk and risk components				5. Risk event tracking and integration of lessons learned				6. Risk-informed wildfire mitigation strategy			
	Minimum of Sub-Cap.	NC	NC	+1	+1	NC	+1	+1	+1	NC	+1	+1	+1	NC	NC	+1	+1	NC	+1	NC	NC	NC	+2	+2	+2
	Average of Sub-Cap.	NC	+0.49	+0.44	+0.44	NC	+0.13	+0.13	+0.13	NC	+0.13	+0.13	+0.13	NC	+0.33	+0.33	+0.33	NC	+0.29	NC	NC	NC	+1	+0.63	+0.63
B. Situational Awareness and Forecasting		7. Ignition likelihood estimation				8. Weather forecasting ability				9. Wildfire spread forecasting				10. Data collection for near-real-time conditions				11. Wildfire detection and alarm systems				12. Centralized monitoring of real-time conditions			
	Minimum of Sub-Cap.	NC	+1	+1	+1	NC	+1	+1	+1	NC	-1.0	-1.0	-1.0	NC	NC	-2.0	-2.0	NC	NC	NC	NC	NC	NC	NC	NC
	Average of Sub-Cap.	NC	NC	-0.2	-0.2	NC	NC	-0.1	-0.1	NC	-0.3	-0.4	-0.4	NC	+0.14	-0.3	-0.3	NC	NC	-0.3	-0.3	NC	NC	NC	NC
C. Grid Design, Inspections, and Maintenance		13. Asset inventory and condition database				14. Asset inspections				15. Asset maintenance and repair				16. Grid design and resiliency				17. Asset and grid personnel training and quality							
	Minimum of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
	Average of Sub-Cap.	NC	NC	+0.25	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	-0.2	-0.2	NC	NC	NC	NC	NC	NC	NC	NC
D. Vegetation Management and Inspections		18. Vegetation inventory and condition database				19. Vegetation inspections				20. Vegetation treatment				21. Vegetation personnel training and quality											
	Minimum of Sub-Cap.	NC	+3	+1	+1	NC	+3	+3	+3	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
	Average of Sub-Cap.	NC	+1	+0.5	+0.5	NC	+2	+1.5	+1.5	NC	NC	NC	NC	NC	+0.5	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
E. Grid Operations and Protocols		22. Protective equipment and device settings				23. Incorporation of ignition risk factors in grid control				24. PSPS operating model				25. Protocols for PSPS re-energization				26. Ignition prevention and suppression							
	Minimum of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	+1	+1	+1	NC	NC	NC	NC	NC	+2	NC	NC	NC	NC	NC	NC
	Average of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	+0.33	+0.17	+0.17	NC	+0.33	NC	NC	NC	+2	NC	NC	NC	NC	NC	NC
F. Emergency Preparedness		27. Wildfire and PSPS emergency and disaster preparedness plan				28. Collaboration and coordination with public safety partners				29. Public emergency communication strategy				30. Preparedness and planning for service restoration				31. Customer support in wildfire and PSPS emergencies				32. Learning after wildfires and PSPS incidents			
	Minimum of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
	Average of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
G. Community Outreach and Engagement		33. Public outreach and education awareness				34. Public engagement in electrical corporation wildfire mitigation planning				35. Engagement with AFN and socially vulnerable populations				36. Collaboration on local wildfire mitigation planning				37. Cooperation and best practice sharing with other electrical corporations							
	Minimum of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	+3	+2	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
	Average of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	+1.67	+0.67	NC	NC	+0.5	NC	NC	NC	+0.67	NC	NC	NC	NC	NC	NC