



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
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Caroline Thomas Jacobs, Director

March 3, 2025

To: Bear Valley Electric Service, Inc.
Paul Marconi
President, Treasurer & Secretary
42020 Garstin Dr, PO BOX 1547
Big Bear Lake, CA 92315

SUBJECT: Office of Energy Infrastructure Safety's Audit on Bear Valley Electric Service Inc's, 2023 Vegetation Management Work

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) completed its audit of Bear Valley Electric Service Inc's (BVES's) 2023 vegetation management work pursuant to its 2023-2025 Wildfire Mitigation Plan.

Energy Safety found that BVES did not provide information consistent with the completion of the work required for three of the thirteen vegetation management initiatives. BVES must submit its Corrective Action Plan response to the 2023 SVM docket¹ in Energy Safety's e-filing system within 30 days from the issuance of this audit. If you have any questions concerning this audit, please e-mail Karen McLaughlin (Karen.McLaughlin@energysafety.ca.gov) and provide a copy to Alec Latuszek (alec.latuszek@energysafety.ca.gov) and environmentalsciencedivision@energysafety.ca.gov.

Sincerely,

Sheryl Bilbrey
Program Manager | Environmental Science Division
Office of Energy Infrastructure Safety

Cc:
Forest Kaser, CPUC
Leslie Palmer, CPUC
Tom Tzu-Tong Chou, BVES
Jarred Hennen, BVES

¹ All documents related to BVES's 2023 SVM audit are available on Energy Safety's e-filing under the "2023 SVM" docket and available here: (<https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2023-SVM>)



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

2023 SUBSTANTIAL VEGETATION

MANAGEMENT AUDIT

BEAR VALLEY ELECTRIC SERVICE, INC.

March 2025

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EXECUTIVE SUMMARY

The Office of Energy Infrastructure Safety (Energy Safety) completed an audit of Bear Valley Electric Service Inc's (BVES) vegetation management commitments from its 2023-2025 Wildfire Mitigation Plan (WMP).¹ The BVES 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas. BVES provided documentation or information demonstrating it performed all work in 10 vegetation management initiatives. However, Energy Safety found that BVES did not provide information consistent with the completion of all work commitments for three of its 13 vegetation management initiatives.

For each audit finding for which Energy Safety determined BVES did not provide information supporting completion of all work commitments in a vegetation management initiative in the WMP, BVES must address that deficiency as part of a corrective action plan. BVES must title its response "Bear Valley Electric Service, Inc 2023 SVM Audit Corrective Action Plan" and submit the response on the 2023 SVM Docket in Energy Safety's E-Filing System within 30 days of receipt of this audit. Requirements for the response are discussed in Section 4 of this document.

Energy Safety is available to meet with BVES to discuss the audit findings and provide any clarification necessary for BVES to timely respond to Energy Safety's audit.

¹ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 183, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

1. OVERVIEW

Pursuant to Public Utilities Code section 8386.3(c)(5), the Office of Energy Infrastructure Safety (Energy Safety) must, on an annual basis, audit the vegetation management work performed by an electrical corporation upon notification that the electrical corporation has completed a substantial portion of the vegetation management requirements in its Wildfire Mitigation Plan (WMP). The vegetation management and inspections requirements audited in this document are in Section 8.2 of the WMP. Vegetation management and Inspections include the following programmatic areas:

- Vegetation inspections
- Vegetation and fuels management
- Vegetation management enterprise system
- Quality assurance / quality control
- Open work orders
- Workforce planning

The WMP identifies the electrical corporation's objectives in each of these programmatic areas as well as the initiatives that will achieve the stated objectives. Initiatives include one or more specific work commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and verifiable narrative statements (e.g., implementation of personnel training programs). Work commitments for each initiative may include only quantitative targets, both quantitative targets and narrative statements, or only narrative statements. Energy Safety assessed completeness of all relevant targets and statements.

The substantial vegetation management (SVM) audit includes Energy Safety's analysis of the electrical corporation's work products during the audit year and determines if the electrical corporation provided documentation sufficient to confirm that all work commitments were completed for each initiative in its WMP. While the WMP lists the initiatives under programmatic headings, Energy Safety assessed work completion at the initiative level.

2023 Bear Valley Electric Service, Inc Substantial Vegetation Management Audit

BVES submitted its SVM 2023 completion notification on January 4, 2024.²

Energy Safety has completed its SVM audit of BVES's vegetation management program activities for 2023. As part of the SVM audit process, Energy Safety identified both quantitative targets and verifiable statements from Section 8.2 of the BVES 2023-2025 WMP. Energy Safety then compared the WMP vegetation management targets and statements to the work performed by BVES in 2023 using Quarterly Data Reports (QDR), non-spatial data tables, and data request responses submitted by BVES.

Table 1 of this report includes a list of all vegetation management initiatives and Energy Safety's findings of whether BVES completed all required work.

The appendix includes a summary of targets and/or narrative statements, supporting information and analysis, conclusions, and findings for each initiative.

² [BVES's 2023 Notification of Substantial Completion of Vegetation Management Initiatives](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56137&shareable=true) (January 4, 2024), (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56137&shareable=true>).

2. 2023 SVM AUDIT FINDINGS

The BVES 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas. Energy Safety's findings regarding completion of all work for each initiative are shown in Table 1. Audit findings in bold indicate that BVES was unable to provide sufficient documentation demonstrating that all work was completed for that initiative. A detailed analysis of quantitative targets and narrative statements, supporting information, conclusions and findings for each initiative are included in the appendix.

Table 1. BVES 2023 SVM Audit Finding Summary

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.2 Vegetation Management Inspections	8.2.2.1-6 Vegetation Management Inspections	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.1 Pole clearing	Did not complete all work
8.2.3 Vegetation and Fuels Management	8.2.3.2 Wood and slash management	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.3 Clearance	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.4 Fall-in mitigation	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.5 Substation defensible space	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.6 High-Risk Species	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.7 Fire-resilient Rights-of-Way	Completed all work

8.2.3 Vegetation and Fuels Management	8.2.3.8 Emergency Response Vegetation Management	Completed all work
8.2.4 Vegetation Management Enterprise System	8.2.4 Vegetation Management Enterprise System	Completed all work
8.2.5 Quality Assurance and Quality Control	8.2.5 Quality Assurance / Quality Control	Completed all work
8.2.6 Open Work Orders	8.2.6 Open Work Orders	Did not Complete all work
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Did not Complete all work

3. 2023 SVM AUDIT CONCLUSION

Energy Safety reviewed the 13 vegetation management initiatives in BVES's 2023-2025 WMP and found BVES provided documentation or information demonstrating it performed all work in 10 vegetation management initiatives. However, BVES was unable to provide supporting documentation or information demonstrating completion of work described in statements and/or targets for the remaining three vegetation management initiatives.

For each audit finding for which Energy Safety determined BVES did not provide documentation or information demonstrating completion of all work in its vegetation management commitments, BVES must submit a response per the requirements outlined in Section 4 to Energy Safety within 30 days of receipt of this audit.

This audit is not an assessment of the quality of BVES's execution of its vegetation management program.

4. BVES AUDIT RESPONSE

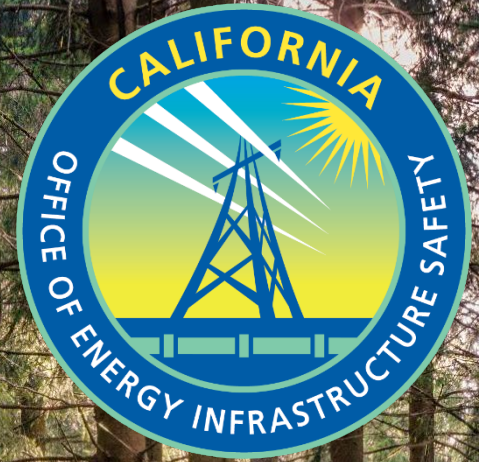
BVES must provide Energy Safety with a response for each initiative in Table 1 with a finding of “did not complete all work” that includes a response addressing the following criteria as described in the Compliance Guidelines³:

1. Should BVES disagree with an audit finding that all work was not performed per the WMP, BVES must provide the basis for that conclusion including detailed supporting documentation and rationale for that response.
2. If BVES contends that the intent of the initiative was met because either a large percentage of the work was completed and/or other vegetation management actions taken by BVES addressed the wildfire risk at issue, BVES must provide specific details and documentation supporting that conclusion.
3. Should BVES agree with the audit finding that all work was not performed for a vegetation management initiative, BVES must provide the following in a corrective action plan:
 - a. Data and/or supporting documents explaining why a commitment was missed,
 - b. The circumstances or mitigating factors as to why a commitment was missed,
 - c. If BVES was aware of the missed commitment during the compliance period, a detailed accounting of any corrective action measures implemented since the end of the compliance period to avoid future missed commitments including long term strategies to reduce or eliminate wildfire risk, and
 - d. Additional actions BVES plans to implement to ensure commitments of a similar nature are not missed in the future.
4. The response must be titled “Bear Valley Electric Service Inc’s 2023 SVM Audit Corrective Action Plan YYYYMMDD⁴.”

³ [Energy Safety Compliance Guidelines \(September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57320&shareable=true), pgs. 12-13
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57320&shareable=true>)

⁴ “YYYYMMDD” represents the date of submission.

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APPENDIX

WORK COMMITMENTS, SUPPORTING INFORMATION AND ANALYSIS, CONCLUSIONS, AND FINDINGS

APPENDIX SUMMARY

Energy Safety analyzed each of the 13 vegetation management initiatives listed in Bear Valley Electric Service Inc.'s (BVES) 2023-2025 Wildfire Mitigation Plan (WMP) as part of this audit. Energy Safety identified the vegetation management work commitments, including quantitative targets and narrative statements, relevant to each initiative and compared that to the work performed by BVES in 2023. Determination of whether all work was complete for each initiative was based on documentation submitted by BVES. For any commitment or statement for which BVES was not able to provide documentation or information to support completion, BVES must submit a response as part of a corrective action plan per the requirements outlined in Section 4.

INITIATIVE ANALYSIS

For each initiative in Section 8.2 (Vegetation Management and Inspections) of BVES's 2023-2025 WMP, Energy Safety assessed completion of all quantitative targets as well as verifiable, narrative statements. For each target/statement, Energy Safety reviewed and analyzed the supporting information provided by BVES and reached a conclusion regarding completion of work described by the target/statement. Energy Safety then provided a finding for each initiative. A finding of "Completed all work" was given only if BVES provided sufficient documentation or supporting information demonstrating completion of all targets and/or statements within that initiative. If any target or statement was incomplete or insufficiently documented, the overall finding for the initiative was "did not complete all work."

8.2.2 Vegetation Management Inspections

The purpose of this initiative was to describe the “Inspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.”⁵

8.2.2.1 Detailed Inspection

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES included the following detailed vegetation inspections target in its 2023-2025 WMP.⁶ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2023 Target	Completed in 2023
Detailed Vegetation Inspections	134 circuit miles	135 circuit miles

Supporting Information and Analysis: BVES provided an Excel file containing records of detailed vegetation inspections conducted in 2023 which included the circuit name, inspection date, and mileage inspected in each circuit.⁷ The Excel file indicated that BVES completed 135 circuit miles of detailed vegetation inspections in 2023.

While Energy Safety utilized the information provided in Data Request 259 to assess BVES's completion of this target, Energy Safety noted that BVES did not provide detailed vegetation inspection data in its 2023 spatial Quarterly Data Report (QDR) submissions to Energy Safety.⁸ BVES must ensure that its detailed vegetation inspection work is recorded in a geospatial geometry and included in future spatial QDR submissions in accordance with Energy Safety's Data Guidelines, which state: “With each quarterly data submission, electrical corporations must submit data for inspections which were either active or completed within the reporting period (i.e., the previous quarter), and data for inspections planned for the next quarter (i.e., the following reporting period).”⁹

⁵ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-24, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

⁶ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 192, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁷ Data Request 259, question 1; attachment “1. Detailed inspection circuits and milage.xlsx.”

⁸ BVES's geospatial 2023 quarters 1-4 Quarterly Data Report.

⁹ [Energy Safety's Data Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true) (version 3.0, December 14, 2022), Section 3.7.5.1 Vegetation Inspections, p. 84 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true).

Conclusion: BVES provided information consistent with the completion of work identified in this target.

8.2.2.2 Patrol Inspection

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES included the following patrol vegetation inspections target in its 2023-2025 WMP.¹⁰ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2023 Target	Completed in 2023
Patrol Vegetation Inspections	211 circuit miles	216 circuit miles

Supporting Information and Analysis: BVES provided an Excel file containing records of patrol vegetation inspections conducted in 2023 which included the circuit name, date of inspection, and number of miles inspected per circuit.¹¹ The Excel file indicated that BVES completed 216 circuit miles of patrol inspections in 2023, exceeding its target.

Energy Safety utilized the information provided in Data Request 259 to assess BVES's completion of this target because it was the most up-to-date accounting of circuit miles completed. However, Energy Safety noted that BVES's non-spatial, Quarterly Initiative Update data (QIU) contained in Table 1 of BVES's Q4 Wildfire Mitigation Data Tables reported that BVES completed 205 circuit miles of patrol inspections.¹² BVES attributed this discrepancy to an update of its geographic information system (GIS) layers which updated BVES's total mileage to 205 primary overhead circuit miles. BVES stated that the mileage reported in Data Request 259 and the 2023 target did not reflect the adjusted totals from the GIS update.¹³ Energy Safety accepted this explanation.

Energy Safety also noted that BVES did not provide patrol vegetation inspection data in its 2023 spatial QDR submissions to Energy Safety.¹⁴ BVES must ensure that its patrol vegetation inspection work is recorded in a geospatial geometry and included in future spatial QDR submissions in accordance with Energy Safety's Data Guidelines, which state: "With each

¹⁰ [BVES's 2023-2025 WMP](#) (Rev. #2, Nov. 16, 2023), p. 192,

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true>).

¹¹ Data Request 259, question 5; attachment "5. Patrol inspection circuits and milage.xlsx."

¹² [BVES's non-spatial, Q4 Wildfire Mitigation Data Tables](#) (Rev. # 0, February 2, 2024), Table 1, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true>).

¹³ Data Request 277, question 1; attachment "Energy Safety DR-277 Response.pdf," p. 2.

¹⁴ BVES's geospatial 2023 quarters 1-4 Quarterly Data Report.

quarterly data submission, electrical corporations must submit data for inspections which were either active or completed within the reporting period (i.e., the previous quarter), and data for inspections planned for the next quarter (i.e., the following reporting period).¹⁵

Conclusion: BVES provided information consistent with the completion of work identified in this target.

8.2.2.3 UAV HD Photography / Videography Inspection

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following unmanned aerial vehicle (UAV), high definition (HD) photography/videography inspection target in its 2023-2025 WMP.¹⁶ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2023 Target	Completed in 2023
UAV HD Photography / Videography Vegetation Inspections	211 circuit miles	211 circuit miles

Supporting Information and Analysis: BVES provided an invoice from its contractor, dated June 30, 2023, requesting payment for the inspection of 211 circuit miles, representing the full extent of BVES's overhead primary distribution system. The invoice indicated that the inspections were conducted between April and June 2023 and utilized unmanned aerial vehicles (UAVs) equipped with HD photography and videography technology.¹⁷

BVES also provided an Excel file of UAV inspection results from 2023, which included the locations of UAV inspections (latitude and longitude), and unique identification numbers for each primary pole location that was inspected.¹⁸ The Excel file indicated that BVES utilized UAV technology to inspect for vegetation compliance issues such as vegetation encroachment within 10' of conductors and dead trees that could strike BVES's facilities at all 6,544 primary pole locations that were in BVES's service area in 2023.¹⁹

¹⁵ [Energy Safety's Data Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true) (version 3.0, December 14, 2022), Section 3.7.5.1 Vegetation Inspections, p. 84 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true).

¹⁶ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 193, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹⁷ Data Request 277, question 3; attachment "3. UAV Invoice.pdf."

¹⁸ Data Request 259, question 10; attachment "10. 2023 UAV Inspection Record.xlsx."

¹⁹ Data Request 259, question 10; attachment "10. 2023 UAV Inspection Record.xlsx."

The UAV HD photography / videography vegetation inspection invoice signed by BVES's contractor indicated that the contractor inspected for vegetation compliance along BVES's entire primary overhead distribution system.²⁰ BVES's 2023-2025 WMP stated that its entire primary overhead distribution system covered 211 circuit miles.²¹ Since the scope of the UAV HD photography and videography technology inspections included the entire service area, inclusive of the primary pole locations and the primary conductors between each of the primary poles, Energy Safety considered the documented inspection of each primary pole location as equivalent to inspecting the full 211 circuit miles of overhead primary conductors spanning the 6,544 primary pole locations listed in the Excel file.

Energy Safety utilized the information provided in Data Request 259 to assess BVES's completion of this target because it was the most up-to-date accounting of circuit miles completed. However, Energy Safety noted that BVES's non-spatial, QIU data contained in Table 1 of BVES's Q4 Wildfire Mitigation Data Tables reported that BVES completed 205 circuit miles of UAV vegetation inspections.²² BVES attributed this discrepancy to an update of its GIS layers which updated BVES's total mileage to 205 primary overhead circuit miles. BVES stated that the mileage reported in the contractor's invoice and the 2023 target did not reflect the adjusted totals from the GIS update.²³ Energy Safety accepted this explanation.

Energy Safety also noted that BVES only provided Asset Inspection Point feature classes for UAV Thermography and HD Photography/Videography work in its 2023 spatial QDR submissions.²⁴ This information indicated that BVES inspected its electrical infrastructure assets using UAV technology. However, the provided information did not indicate that BVES utilized UAV technology to assess vegetation compliance. BVES must ensure that its UAV HD photography/videography vegetation inspection work is recorded in a geospatial geometry and included in future spatial QDR submissions in accordance with Energy Safety's Data Guidelines.²⁵

Conclusion: BVES provided information consistent with the completion of work identified in this target.

²⁰ Data Request 277, question 3; attachment "3. UAV Invoice.pdf."

²¹ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 199, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

²² [BVES's non-spatial, Q4 Wildfire Mitigation Data Tables](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true), (Rev. # 0, February 2, 2024), Table 1, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true).

²³ Data Request 277, question 1; attachment "Energy Safety DR-277 Response.pdf," p. 2.

²⁴ BVES's geospatial 2023 quarters 1-4 Quarterly Data Report.

²⁵ [Energy Safety's Data Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true) (version 3.0, December 14, 2022), Section 3.7.5.1 Vegetation Inspections, p. 84 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true).

8.2.2.4 LiDAR Inspection

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following LiDAR Vegetation Inspection target in its 2023-2025 WMP.²⁶ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2023 Target	Completed in 2023
LiDAR Vegetation Inspections	211 circuit miles	211 circuit miles

Supporting Information and Analysis: BVES provided a signed contract with its contractor outlining the LiDAR vegetation inspection work scheduled for 2023. The contract outlines the contractor's agreement to inspect all 211 circuit miles of BVES's overhead sub-transmission and distribution lines and facilities during the year.²⁷ BVES also submitted an invoice from the contractor requesting payment for the completed 2023 LiDAR inspection work.²⁸ BVES also provided an agenda from a "LiDAR Inspection Kick-off Meeting" held on April 20, 2023, which outlined the scope and timeline of the inspections and specified that the contractor was responsible for inspecting 211 circuit miles of BVES's electric system.²⁹ Lastly, BVES provided an Excel file listing all confirmed vegetation compliance issues that were identified via LiDAR by BVES's contractor in 2023.³⁰ Energy safety utilized this Excel file, which synthesized the contractor's LiDAR data to verify that BVES's electric system was inspected for vegetation compliance issues via LiDAR in 2023. These documents indicate that BVES met its target associated with LiDAR vegetation inspections in 2023.

Energy Safety utilized the information provided in Data Request 259 and Data Request 277 to assess BVES's completion of this target. However, Energy Safety noted that BVES's non-spatial, QIU data contained in Table 1 of BVES's Q4 Wildfire Mitigation Data Tables reported that BVES completed 205 circuit miles of LiDAR vegetation inspections.³¹ BVES attributed this discrepancy to an update of its GIS layers which updated BVES's total mileage to 205 primary overhead circuit miles. BVES stated that the mileage reported in the contractor's signed

²⁶ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 193, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

²⁷ Data Request 277, question 5; attachment "5. LiDAR Contract.pdf."

²⁸ Data Request 277, question 5; attachment "5. LiDAR invoice.pdf."

²⁹ Data Request 259, question 12; attachment "12. LiDAR Inspection Kick-off Meeting Agenda.pdf."

³⁰ Data Request 259, question 13; attachment "13. 2023 LiDAR confirmed findings.xlsx."

³¹ [BVES's non-spatial, Q4 Wildfire Mitigation Data Tables](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true), (Rev. # 0, February 2, 2024), Table 1, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true).

contract and invoice, Kick-Off Meeting, and the 2023 target did not reflect the adjusted totals from the GIS update.³² Energy Safety accepted this explanation.

Energy Safety also noted that BVES did not provide LiDAR vegetation inspection data in its 2023 spatial QDR submissions to Energy Safety.³³ BVES must ensure that its LiDAR vegetation inspection work is recorded in a geospatial geometry and included in future spatial QDR submissions in accordance with Energy Safety’s Data Guidelines.³⁴

Conclusion: BVES provided information consistent with the completion of work identified in this target.

8.2.2.5 3rd Party Ground Patrol Inspection

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following 3rd party ground patrol inspection target in its 2023-2025 WMP.³⁵ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES’s 2023 Target	Completed in 2023
3 rd Party Ground Patrol Vegetation Inspections	211 circuit miles	211 circuit miles

Supporting Information and Analysis: BVES provided a signed contract for the 3rd party ground patrol vegetation inspection work scheduled for 2023. The contract indicated that BVES’s contractor would inspect all 211 circuit miles of BVES’s overhead primary distribution system.³⁶

BVES also provided an Excel file of third-party ground patrol inspection results from 2023, which included the locations of the inspections (latitude and longitude), and unique identification numbers for each pole location that was inspected.³⁷ The Excel file indicated that BVES utilized 3rd party ground patrol inspections to inspect for vegetation compliance

³² Data Request 277, question 6; attachment “Energy Safety DR-277 Response.pdf,” p. 3.

³³ BVES’s geospatial 2023 quarters 1-4 Quarterly Data Report.

³⁴ [Energy Safety’s Data Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true) (version 3.0, December 14, 2022), Section 3.7.5.1 Vegetation Inspections, p. 84 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true).

³⁵ [BVES’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 193, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

³⁶ Data Request 259, question 15; attachment “15. 3rd party ground patrol contract.pdf.”

³⁷ Data Request 277, question 7; attachment “7. Entire 2023 3rd Party Ground Patrol.xlsx.”

issues such as vegetation encroachment within six feet of primary conductors at all 6,544 primary pole locations along the 2011 circuit miles that were in BVES's service area in 2023.

BVES's signed third-party ground patrol contract stated that BVES's contractor would inspect for vegetation compliance along the entire primary overhead distribution system.³⁸ BVES's 2023-2025 WMP stated that its entire primary overhead distribution system covered 211 circuit miles.³⁹ Since the scope of the third-party ground patrol inspections included both the pole locations and the primary conductors between each pole, Energy Safety considered the documented inspection of each primary pole location as equivalent to inspecting the full 211 circuit miles of overhead primary conductors spanning the 6,544 primary pole locations listed in the Excel file.

Energy Safety utilized the information provided in Data Request 259 and Data Request 277 to assess BVES's completion of this target. However, Energy Safety noted that BVES's non-spatial, QIU data contained in Table 1 of BVES's Q4 Wildfire Mitigation Data Tables reported that BVES completed 205 circuit miles of 3rd party ground patrol vegetation inspections.⁴⁰ BVES attributed this discrepancy to an update of its GIS layers which updated BVES's total mileage to approximately 205 primary overhead circuit miles. BVES stated that the mileage reported in the contractor's signed contract, and the 2023 target did not reflect the adjusted totals from the GIS update.⁴¹ Energy Safety accepted this explanation.

Energy Safety also noted that BVES did not provide 3rd party ground patrol vegetation inspection data in its 2023 spatial QDR submissions to Energy Safety.⁴² BVES must ensure that its 3rd party ground patrol vegetation inspection work is recorded in a geospatial geometry and included in future spatial QDR submissions in accordance with Energy Safety's Data Guidelines.⁴³

Conclusion: BVES provided information consistent with the completion of work identified in this target.

³⁸ Data Request 259, question 15; attachment "15. 3rd party ground patrol contract.pdf."

³⁹ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 199, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁴⁰ [BVES's non-spatial, Q4 Wildfire Mitigation Data Tables](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true), (Rev. # 0, February 2, 2024), Table 1, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true).

⁴¹ Data Request 277, question 1; attachment "Energy Safety DR-277 Response.pdf," p. 2.

⁴² BVES's geospatial 2023 quarters 1-4 Quarterly Data Report.

⁴³ [Energy Safety's Data Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true) (version 3.0, December 14, 2022), Section 3.7.5.1 Vegetation Inspections, p. 84 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true).

8.2.2.6 Substation Inspection

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following Substation Vegetation Inspections target in its 2023-2025 WMP.⁴⁴ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2023 Target	Completed in 2023
Substation Vegetation Inspections	144 inspections	156 inspections

Supporting Information and Analysis: BVES stated in its 2023-2025 WMP that it would inspect 211 circuit miles to meet this target.⁴⁵ However, in Data Request 277, BVES stated that the 211 circuit miles were incorrectly listed as the unit of measure for this target in the 2023-2025 WMP. Instead, BVES intended to measure the completion of its 2023 substation vegetation inspection target by the number of inspections completed rather than circuit miles inspected.⁴⁶ Additionally, BVES's Q1-Q4 QIU data submissions indicated that BVES used "number of substations inspected" as the quantitative unit of measure for its substation vegetation inspections target, committing to inspecting 144 substations in 2023.⁴⁷ Because substations are not linear assets and cannot be measured in circuit miles, and because BVES informed Energy Safety that the 211 circuit mile target was included in error, Energy Safety assessed BVES's completion of its substation vegetation inspections target based on the quantitative unit of measure of 144 substation inspections. This error has been corrected in BVES's 2025 WMP Update.⁴⁸

⁴⁴ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 193, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁴⁵ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 193, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁴⁶ Data Request 277, question 9; attachment "Energy Safety DR-277 Response.pdf," p. 4.

⁴⁷ [BVES's non-spatial, Q1 Wildfire Mitigation Data Tables](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55575&shareable=true), (Rev. # 1, September 7, 2023), Table 1, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55575&shareable=true), [BVES's non-spatial, Q2 Wildfire Mitigation Data Tables](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55576&shareable=true), (Rev. # 1, September 7, 2023), Table 1, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55576&shareable=true), [BVES's non-spatial, Q3 Wildfire Mitigation Data Tables](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55919&shareable=true), (Rev. # 0, November 3, 2023), Table 1, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55919&shareable=true), [BVES's non-spatial, Q4 Wildfire Mitigation Data Tables](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true), (Rev. # 0, February 2, 2024), Table 1, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true).

⁴⁸ [BVES's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true) (Rev. #0, April 2, 2024), p. 12, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56397&shareable=true).

BVES provided an Excel file listing all substation inspections conducted in 2023. The Excel file included the name and location of each substation inspected, inspection dates, and inspection notes pertaining to vegetation growth.⁴⁹ The Excel file indicated that BVES conducted monthly vegetation inspections at each of its 13 substations in 2023 (156 total inspections).

Energy Safety noted that BVES's Q4 QIU data submissions indicated that BVES inspected a total of only 144 substation vegetation inspections, which was less than the 156 indicated in response to Data Request 259.⁵⁰ In response to this discrepancy, BVES stated that it only tracked inspections up to the 144 inspection target and did not include additional inspections completed beyond the target in its QIU data submissions.⁵¹ In this case, the discrepancy did not affect the conclusion related to completion of work on this target. However, BVES must provide accurate information to Energy Safety in its QDR submissions in accordance with Energy Safety's Data Guidelines.

Energy Safety utilized the information provided in Data Request 259 and Data Request 277 to assess BVES's completion of this target. However, Energy Safety also noted that BVES did not provide substation vegetation inspection data in its 2023 spatial QDR submissions to Energy Safety.⁵² BVES must ensure that its substation vegetation inspection work is recorded in a geospatial geometry and included in future spatial QDR submissions in accordance with Energy Safety's Data Guidelines.⁵³

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Finding- 8.2.2 Vegetation Management Inspections

BVES provided information consistent with the completion of all work identified in Initiative 8.2.2 Vegetation Management Inspections.

⁴⁹ Data Request 259, question 28; attachment "18. Substation Inspections.xlsx."

⁵⁰ [BVES's non-spatial, Q4 Wildfire Mitigation Data Tables](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true), (Rev. # 0, February 2, 2024), Table 1, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true), Data Request 259, question 28; attachment "18. Substation Inspections.xlsx."

⁵¹ Data Request 277, question 10; attachment "Energy Safety DR-277 Response.pdf," p. 4.

⁵² BVES's geospatial 2023 quarters 1-4 Quarterly Data Report.

⁵³ [Energy Safety's Data Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true) (version 3.0, December 14, 2022), Section 3.7.5.1 Vegetation Inspections, p. 84 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true).

8.2.3.1 Vegetation and Fuels Management- Pole Clearing

The purpose of this initiative was to describe the “Plan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area).”⁵⁴

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 1

Statement: “For poles or structures that have non-exempt equipment per CALFIRE requirements, all flammable material and vegetation in a 10-foot radius around the base of the pole or structure shall be cut down and removed during each normal vegetation management cycle clearance visit. Exceptions per the effective California Power Line Fire Prevention Field Guide are authorized. BVES also clears around exempt poles, where possible.”⁵⁵

Supporting Information and Analysis: BVES stated that “in 2023 BVES did not conduct any pole brushing. BVES is currently collecting data on what poles have non-exempt equipment. Currently, when BVES finds non-exempt equipment, BVES will replace with exempt equipment as soon as possible. If the equipment cannot be changed out, BVES will then conduct pole brushing on the pole.”⁵⁶ BVES could not provide records of inspections related to Public Resource Code 4292 non-exempt equipment or non-exempt equipment that was changed out with exempt equipment in 2023.⁵⁷

Because BVES did not provide records of the locations of its equipment, it could not demonstrate that the work described in Statement 1 was completed or that BVES met the objective of this initiative by addressing wildfire risk related to vegetation surrounding BVES’s pole assets.

Conclusion: BVES did not provide information consistent with the completion of work identified in this statement.

⁵⁴ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-24, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

⁵⁵ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 203, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁵⁶ Response to DR-259, question 19; attachment “Energy Safety DR-259 Response.pdf,” p. 6.

⁵⁷ Data Request 277, question 11; attachment “Energy Safety DR-277 Response.pdf,” p. 4.

Finding- 8.2.3.1 Pole Clearing

BVES did not provide information consistent with the completion of work identified in initiative 8.2.3.1 Pole Clearing. BVES must supply a corrective action plan addressing the deficiency identified in Statement 1 above.

8.2.3.2 Vegetation and Fuels Management- Wood and Slash Management

The purpose of this initiative was to take actions “to manage all downed wood and “slash” generated from vegetation management activities.”⁵⁸

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following wood and slash management narrative target in its 2023-2025 WMP.⁵⁹ Because it was included in BVES’s target table, it is summarized in the table below to be consistent with the structure of BVES’s WMP.

Initiative Activity	BVES’s 2023 Target	Completed in 2023
Wood and Slash Management	Contractor adherence to waste removal	Achieved

Supporting Information and Analysis: In its 2023-2025 WMP, BVES states that “BVES’s vegetation clearance contractor clears vegetation and removes all vegetation waste and slash from the area every day. If the property owner wants the vegetation waste (for firewood, chipping, etc.), the contractor will assist the property owner in removing the vegetation waste from the rights-of-way for their use.”⁶⁰ BVES provided its Fuel Management and Reduction of Slash Policy, which outlined BVES’s guidelines for the wood slash disposal practices to which its contractors must adhere.⁶¹ BVES also provided screenshots of email correspondence between BVES and its contractor discussing locations in need of waste and slash

⁵⁸ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-24, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

⁵⁹ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 192, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁶⁰ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 204, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁶¹ Data Request 259, question 21; attachment “21. Policy of Fuel Management and Reduction of Slash.pdf.”

management.⁶² Further, BVES stated that it conducted weekly quality checks on its contractors in 2023 and provided a tree trimming QC report which was completed by BVES's Reliability Engineer in June of 2023.⁶³ The report indicated that the Reliability Engineer did not find any failures on the contractor's behalf related to wood and slash management requirements. Lastly, BVES provided an Excel file listing 133 "brush clean up" work orders that were addressed and completed by BVES's contractor in 2023.⁶⁴

The provided information indicated that BVES had procedural documents in place that outlined its waste removal requirements, that BVES actively monitored the work of its contractor to ensure the requirements were met, and that the contractor completed waste removal work in 2023.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Finding- 8.2.3.2 Wood and Slash Management

BVES provided information consistent with the completion of work identified in Initiative 8.2.3.2 Wood and Slash Management.

⁶² Data Request 259, question 22; attachment "22. Brush pick up email.pdf."

⁶³ Data Request 259, question 23; attachment "23. BVES QC on contractor.pdf."

⁶⁴ Data Request 259, question 44; attachment "44. 2023 Work Orders.xlsx."

8.2.3.3 Vegetation and Fuels Management- Clearance

The purpose of this initiative was to take actions “after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming.”⁶⁵

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following clearance target in its 2023-2025 WMP.⁶⁶ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2023 Target	Completed in 2023
Clearance	72 circuit miles	72 circuit miles

Supporting Information and Analysis: BVES provided a map of its electrical system which organized BVES's service area into 108 square grids that were each labeled with a unique identification number. The map indicated that BVES completed clearance work in 16 of the 108 grids delineated in the map.⁶⁷ Additionally, BVES provided an Excel file detailing the length of each line segment contained in the 16 grids that received vegetation clearance work. The Excel file indicated that BVES completed vegetation clearance work along 72 circuit miles of electric lines in 2023.⁶⁸ Lastly, BVES provided an Excel file containing records of vegetation clearance work orders from 2023, which indicated that BVES trimmed 3,926 trees to achieve clearance from its electrical equipment and facilities in 2023.⁶⁹

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Finding- 8.2.3.3 Clearance

BVES provided information consistent with the completion of work identified in initiative 8.2.3.3 Clearance.

⁶⁵ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-24, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

⁶⁶ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 190, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁶⁷ Supplemental response to Data Request 277, question 13; attachment “2023 VEG Grids OH Lines.pdf.”

⁶⁸ Data Request 259, question 26; attachment “26. 2023 Vegetation milage.xlsx.”

⁶⁹ Data Request 259, question 44; attachment “44. 2023 Work Orders.xlsx.”

8.2.3.4 Vegetation and Fuels Management- Fall-in Mitigation

The purpose of this initiative was to take actions “to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment.”⁷⁰

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following fall-in mitigation target in its 2023-2025 WMP.⁷¹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES’s 2023 Target	Completed in 2023
Fall-in Mitigation	88 trees	168 trees

Supporting Information and Analysis: BVES provided an Excel file containing records of all tree removal work completed by BVES in 2023. The Excel file included tree location and species information for each tree removed, the date each tree was assigned removal work, and the date the removal work was completed.⁷² The Excel file indicated that BVES removed 168 trees in 2023, exceeding its fall-in mitigation target.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Finding- 8.2.3.4: Fall-in Mitigation

BVES provided information consistent with the completion of work identified in initiative 8.2.3.4 Fall-in Mitigation.

⁷⁰ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-24, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

⁷¹ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 190, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁷² Data Request 259, question 27; attachment “27. 2023 Tree Removals.xlsx.”

8.2.3.5 Vegetation and Fuels Management-Substation Defensible Space

The purpose of this initiative was to take actions “to reduce ignition probability and wildfire consequence due to contact with substation equipment.”⁷³

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following substation defensible space target in its 2023-2025 WMP.⁷⁴ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES’s 2023 Target	Completed in 2023
Substation Defensible Space	13 substations	13 substations

Supporting Information and Analysis: In addition to BVES’s substation inspection target, BVES also included a substation defensible space target in its 2023–2025 WMP which focused not only on substation vegetation inspections but also vegetation management clearance work. BVES provided an Excel file containing substation inspection records from 2023, which included substation name and location information, inspection dates, and the dates vegetation management activities were completed at each substation.⁷⁵ The Excel file indicated that BVES inspected each of its 13 substations monthly and conducted weed abatement maintenance at each substation at least once in 2023 in response to the inspection results.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Finding- 8.2.3.5: Substation Defensible Space

BVES provided information consistent with the completion of work identified in initiative 8.2.3.5 Substation Defensible Space.

⁷³ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-25, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

⁷⁴ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 190, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁷⁵ Data Request 259, question 28; attachment “18. Substation Inspections.xlsx.”

8.2.3.6 Vegetation and Fuels Management- High-Risk Species

The purpose of this initiative was to take actions “to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation.”⁷⁶

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following high-risk species narrative target in its 2023-2025 WMP.⁷⁷ Because it was included in BVES’s target table, it is summarized in the table below to be consistent with the structure of BVES’s WMP.

Initiative Activity	BVES’s 2023 Target	Completed in 2023
High-Risk Species	WMP review and vegetation discussion with experts	Achieved

Supporting Information and Analysis: In its 2023-2025 WMP, BVES states “BVES has a vegetation management plan in place that meets or exceeds the minimum requirements of the CPUC’s applicable GOs... The plan will be reviewed and updated on an as needed basis not to exceed three years, depending on changing conditions.”⁷⁸

BVES provided a copy of its 2023 Vegetation Management Program Annual Audit, which was conducted by BVES’s Contract Forester in January 2024.⁷⁹ The report evaluated BVES’s various vegetation management activities including vegetation management line clearance work, vegetation management inspections, and vegetation management quality control checks. Overall, the forester found that BVES’s vegetation management activities were adequate, but stated in the report that “a more aggressive approach on removals focusing on problem vegetation will help the VM Program become more proactive and will also reduce call outs.”⁸⁰ BVES stated that the forester who conducted the program-wide audit was a vegetation expert and the Program Audit identified the forester.⁸¹ Energy Safety

⁷⁶ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-25, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

⁷⁷ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 190, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁷⁸ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 208, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁷⁹ Data Request 259, question 30; attachment “43. Vegetation Management Program Annual Audit 2023.pdf.”

⁸⁰ Data Request 259, question 30; attachment “43. Vegetation Management Program Annual Audit 2023.pdf.”

⁸¹ Data Request 259, question 32; attachment “Energy Safety DR-259 Response.pdf.”

independently verified the credentials of the Contract Forester. BVES did not indicate that it intended to make any improvements or changes to its vegetation management program based on the Contract Forester's report. The provided information indicated that BVES completed the work described in this target by having a "vegetation expert" review its 2023 vegetation management program and provide suggestions for improving the program moving forward.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 2

Statement: "BVES will consider the removal of any fast-growing trees, such as Poplars, Aspens, or Cottonwood, rotten or diseased trees, and healthy trees hanging over or leaning towards bare lines."⁸²

Supporting Information and Analysis: BVES provided an Excel file containing records of all tree removal work completed in 2023. The Excel file included location and species information for each tree that was removed, the date each tree was assigned removal work, and the date the removal work was completed. The Excel file indicated that BVES removed 168 trees in 2023, which consisted of the following species: Pine, Cedar, Fir, Maple, Oak, Poplar, and other.⁸³ Additionally, BVES stated that it considered all of the tree species removed in 2023 to be high risk species.⁸⁴

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Finding- 8.2.3.6: High-Risk Species

BVES provided information consistent with the completion of work identified in initiative 8.2.3.6 High-Risk Species.

⁸² [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 208, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁸³ Data Request 259, question 27; attachment "27. 2023 Tree Removals.xlsx."

⁸⁴ Data Request 259, question 31; attachment "Energy Safety DR-259 Response.pdf," p. 9.

8.2.3.7 Vegetation and Fuels Management- Fire-Resilient Rights-of-Way

The purpose of this initiative was to take actions “to promote vegetation communities that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way.”⁸⁵

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following fire resilient rights-of-way narrative target in its 2023-2025 WMP.

⁸⁶ Because it was included in BVES’s target table, it is summarized in the table below to be consistent with the structure of BVES’s WMP.

Initiative Activity	BVES’s 2023 Target	Completed in 2023
Fire-Resilient Rights-of-Way	WMP review and vegetation discussion with experts	Achieved

Supporting Information and Analysis: In its 2023-2025 WMP, BVES states “BVES has a vegetation management plan in place that meets or exceeds the minimum requirements of the CPUC’s applicable GOs... The plan will be reviewed and updated on an as needed basis not to exceed three years, depending on changing conditions.”⁸⁷

BVES provided a copy of its 2023 Vegetation Management Annual Program Audit, which was conducted by BVES’s Contract Forester in January 2024.⁸⁸ The report evaluated BVES’s various vegetation management activities including VM line clearance work, VM inspections, and VM quality control checks. Overall, the forester found that BVES’s vegetation management activities were adequate, but stated in the report that “a more aggressive approach on removals focusing on problem vegetation will help the VM Program become more proactive and will also reduce call outs.”⁸⁹ BVES stated that the forester who conducted the program-wide audit was a vegetation expert and the Program Audit identified the

⁸⁵ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-25, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

⁸⁶ [BVES’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 191, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁸⁷ [BVES’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 209, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁸⁸ Data Request 259, question 32; attachment “43. Vegetation Management Program Annual Audit 2023.pdf.”

⁸⁹ Data Request 259, question 30; attachment “43. Vegetation Management Program Annual Audit 2023.pdf.”

forester.⁹⁰ Energy Safety independently verified the credentials of the Contract Forester. BVES did not indicate that it intended to make any improvements or changes to its vegetation management program based on the Contract Forester's report. The provided information indicated that BVES completed the work described in this target by having a "vegetation expert" review its 2023 vegetation management program and provide suggestions for improving the program moving forward.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 3

Statement: "All brush, limbs and foliage in the ROW [right of way] shall be cut up to 8-feet above the ground. All dead, dying, diseased, or dried vegetation from 8 feet above the ground to the top of the power lines must be removed during each normal vegetation management cycle clearance visit."⁹¹

Supporting Information and Analysis: BVES provided its Vegetation Management Policy and Procedure document which was given to its contracted crews providing specific guidance related to managing vegetation in the ROW, including the procedures detailed in Statement 3 above.⁹² BVES also provided an Excel file of daily work logs, which documented vegetation management work completed by contracted staff along BVES's rights-of-ways in 2023.⁹³ The provided information indicated that BVES had procedural documentation in place that required its contractors to perform the work described in Statement 3 above, and that BVES hired contractors to perform the work in 2023.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Finding- 8.2.3.7 Fire-Resilient Rights-of-Way

BVES provided information consistent with the completion of work identified in initiative 8.2.3.7 Fire-Resilient Rights-of-Way.

⁹⁰ Data Request 259, question 32; attachment "Energy Safety DR-259 Response.pdf."

⁹¹ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 209, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁹² Data Request 259, question 33; attachment "33. BVES VM policies and procedures.pdf."

⁹³ Data Request 259, question 34; attachment "34. ROW work.xlsx."

8.2.3.8 Emergency Response Vegetation Management

The purpose of this initiative was the “planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration.”⁹⁴

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following emergency response vegetation management narrative target in its 2023-2025 WMP.⁹⁵ Because it was included in BVES’s target table, it is summarized in the table below to be consistent with the structure of BVES’s WMP.

Initiative Activity	BVES’s 2023 Target	Completed in 2023
Emergency Response Vegetation Management	Verification of readiness and review of plan	Achieved

Supporting Information and Analysis: BVES provided a copy of its Emergency and Disaster Response Plan,⁹⁶ which states that “The Emergency & Disaster Response Plan (ERDP) is provided to all Bear Valley Electric Service, Inc. (“BVES”) employees to ensure an efficient, effective and uniform response during an emergency situation.”⁹⁷ The plan indicates that the most recent update to the plan was March 31, 2022 (Revision 2) and the DR response indicated that no additional updates were required in 2023.⁹⁸

BVES also stated that it reviewed its emergency response plan during a vegetation program training event held in 2023.⁹⁹ BVES provided an attendance sheet from the training which showed that six individuals attended a 60-minute vegetation program training that was held on October 16, 2023.¹⁰⁰ The provided information indicated that BVES performed the work

⁹⁴ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-25, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

⁹⁵ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 191,

(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

⁹⁶ Data Request 259, question 36; attachment 35. “Emergency and Disaster Response Plan.pdf.”

⁹⁷ Data Request 259, question 36; attachment 35. “Emergency and Disaster Response Plan.pdf.” p. 6.

⁹⁸ Data Request 259, question 36; attachment “Energy Safety DR-259 Response.pdf,” p. 10.

⁹⁹ Data Request 259, question 36; attachment “Energy Safety DR-259 Response.pdf,” p. 10.

¹⁰⁰ Data Request 259, question 36; attachment “4. Vegetation Program Training.pdf.”

described in this target by holding a training in 2023 that reviewed its Emergency and Disaster Response Plan.

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 4

Statement: “BVES will continue conversations with CAL FIRE, other utilities, and vegetation contractors to develop a list of preparations that would be beneficial to have in place in the event the service area experiences a wildfire.”¹⁰¹

Supporting Information and Analysis: BVES provided a list of meetings BVES attended in 2023 related to utility vegetation management best practices, and wildfire preparedness.¹⁰² The list indicated that BVES attended 13 of these meetings in collaboration with other utilities, and state agencies such as CAL FIRE throughout 2023. The meetings included discussions and presentations by other utilities and state agencies which discussed wildfire preparedness topics such as fast trip devices and de-energizations, mitigation issues of statewide concern, and risk assessment/modeling.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Statement 5

Statement: “[Emergency Vegetation Clearance work] includes completing maintenance on an as needed basis for any major disaster or emergency events. For example, if a storm results in fallen trees and branches, the contractor must mobilize as soon as possible to clear the vegetation.”¹⁰³

Supporting Information and Analysis: BVES provided a completed work approval form documenting the hours and units of emergency vegetation clearance work performed by contracted crews in response to a storm event in February 2023.¹⁰⁴ The form indicated that BVES’s contractors completed 28 units of emergency vegetation clearance work in response to this storm event.

¹⁰¹ [BVES’s 2023-2025 WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 210, (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹⁰² Data Request 259, question 37; attachment “37. 2023 VM and wildfire risk meetings.xlsx.”

¹⁰³ [BVES’s 2023-2025 WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 210, (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹⁰⁴ Data Request 259, question 38; attachment “38. Storm work order.pdf.”

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Finding- 8.2.3.8: Emergency Response Vegetation Management

BVES provided information consistent with the completion of work identified in initiative 8.2.3.8 Emergency Response Vegetation Management.

8.2.4 Vegetation Management Enterprise System

The purpose of this initiative was to describe the “Operation of and support for centralized vegetation management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work.”¹⁰⁵

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following vegetation management enterprise system narrative target in its 2023-2025 WMP.¹⁰⁶ Because it was included in BVES’s target table, it is summarized in the table below to be consistent with the structure of BVES’s WMP.

Initiative Activity	BVES’s 2023 Target	Completed in 2023
Vegetation Management Enterprise System	Ongoing monitoring and maintenance of vegetation management enterprise system	Achieved

Supporting Information and Analysis: BVES provided a signed contract with iRestore, a vegetation management enterprise system software developer, dated January 2022. The contract confirmed a five-year agreement for ongoing software access, training, maintenance, and technical support for BVES’s vegetation management enterprise system until 2027.¹⁰⁷

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

¹⁰⁵ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-25, (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

¹⁰⁶ [BVES's 2023-2025 WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 191, (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹⁰⁷ Data Request 277, question 15; attachment “15. iRestore contract.pdf.”

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 6

Statement: “BVES is implementing a new vegetation management enterprise system in 2023 created specifically to meet BVES needs. The program is called “iRestore Tree Action Inventory Application.”¹⁰⁸

Supporting Information and Analysis: BVES provided a screenshot generated from the iRestore Tree Action Inventory Application of a vegetation inspection work order that was completed in 2023.¹⁰⁹ The screenshot included details such as inspection location information, prior vegetation inspection dates that occurred at the same location, and upcoming scheduled inspections for the location. The screenshot indicated that BVES leveraged the iRestore app in 2023 to track vegetation inspection activities.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Finding- 8.2.4 Vegetation Management Enterprise System

BVES provided information consistent with the completion of work identified in initiative 8.2.4 Vegetation Management Enterprise System.

¹⁰⁸ [BVES's 2023-2025 WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), pp. 210-211, (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹⁰⁹ Data Request 259, question 40; attachment “40. iRestore work orders.pdf.”

8.2.5 Quality Assurance and Quality Control

The purpose of this initiative was to describe the “Establishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.”¹¹⁰

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following quality assurance / quality control target in its 2023-2025 WMP.¹¹¹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	BVES's 2023 Target	Completed in 2023
Quality Assurance / Quality Control	72 vegetation QCs	131 vegetation QCs

Supporting Information and Analysis: BVES provided an Excel file containing records of vegetation quality checks (QCs) performed in 2023. The Excel file included the inspector's name, QC date, location, number of trees inspected at each QC location, and the result of each QC.¹¹² The Excel file indicated that in 2023, BVES conducted 131 vegetation QCs at different locations in BVES's service area. At each location, BVES staff inspected nearby trees to ensure compliance with relevant regulations and internal procedures. In doing so, BVES inspected a total of 995 trees during 2023 vegetation QCs, of which, only four were reported to be out of compliance. The provided information indicated that BVES exceeded its quality assurance and quality control target.

While Energy Safety applied the information referenced above to assess BVES's completion of this target, Energy Safety notes that BVES did not submit an initiative audit feature class in any of its 2023 spatial QDR submissions.¹¹³ BVES must ensure that it reports all audits of vegetation management inspections, and vegetation management projects in future spatial QDR submissions in accordance with Energy Safety's Data Guidelines.¹¹⁴

¹¹⁰ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-25, (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

¹¹¹ [BVES's 2023-2025 WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 191, (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹¹² Data Request 259, question 41; attachment “41. 2023 Veg QC.xlsx.”

¹¹³ BVES's geospatial 2023 Q1-4 Quarterly Data Report.

¹¹⁴ [Energy Safety's Data Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true) (version 3.0, December 14, 2022), Section 3.7.5.6 Initiative Audits, pp. 137-138 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true).

Conclusion: BVES provided information consistent with the completion of work identified in this target.

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 7

Statement: “BVES conducts frequent QC checks of its vegetation contractor’s work execution. Discrepancies noted during QC checks, detailed inspections, patrols of overhead circuits, or other means, are generally forwarded to contracted resource via the Kintone Tree Trimming QC application provided by BVES. The contractor responds by marking whether completion of corrective actions is achieved through the software database.”¹¹⁵

Supporting Information and Analysis: BVES provided an Excel file generated from the Kintone Tree Trimming QC application, which included all vegetation compliance discrepancies identified during QCs in 2023.¹¹⁶ The file included information such as the inspector’s name, inspection and remediation dates, location, and descriptions of the discrepancies. The Excel file indicated that BVES and its contractor utilized the Kintone application to track and resolve four QC discrepancies in 2023.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Statement 8

Statement: “Additionally, an annual QA audit is conducted by the Forester in January of each year covering the previous calendar year. The audit provides a comprehensive review of the VM Program.”¹¹⁷

Supporting Information and Analysis: BVES provided a copy of its 2023 Vegetation Management Program Annual Audit, which was conducted by BVES’s Contract Forester in January 2024.¹¹⁸ The report evaluated the following vegetation management activities for their effectiveness and adherence to BVES policies and procedures: Line Clearance, Inspections (including patrol, detailed, LiDAR, etc.) QC Checks, Quarterly Reports, and the overall VM Program. With respect to BVES’s overall vegetation management program, the audit report provided recommendations for improvement in future years and concluded that BVES reached its WMP goals in 2023. In the Audit, the Contract Forester indicated that the scope and protocols in the three VM program areas evaluated in the audit were effective but

¹¹⁵ [BVES’s 2023-2025 WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 215, (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹¹⁶ Data Request 259, question 42; attachment “42. Kintone QC Finding.xlsx.”

¹¹⁷ [BVES’s 2023-2025 WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 213, (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹¹⁸ Data Request 259, question 43; attachment “43. Vegetation Management Program Annual Audit 2023.pdf.”

stressed the importance of adherence to the established protocols and standards to maintain an effective VM program.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Finding- 8.2.5 Quality Assurance and Quality Control

BVES provided information consistent with the completion of work identified in Initiative 8.2.5 Quality Assurance and Quality Control.

8.2.6 Open Work Orders

The purpose of this initiative was to describe the “Actions taken to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”¹¹⁹

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following open work orders narrative target in its 2023-2025 WMP.¹²⁰ Because it was included in BVES’s target table, it is summarized in the table below to be consistent with the structure of BVES’s WMP.

Initiative Activity	BVES’s 2023 Target	Completed in 2023
Open Work Orders	No discrepancy exceeding GO 95 resolution timeframes	Not Achieved

Supporting Information and Analysis: BVES provided an Excel file containing records of all work orders completed in 2023. The Excel file included the dates the work orders were created and closed, location information and HFTD designation.¹²¹ The Excel file indicated that 2,441 work orders were generated in 2023. Of those work orders, 2,368, or 97% were completed on the same day the work order was created. The remaining 73 work orders were completed between 2 and 18 days after the work orders were created. However, the Excel file did not include associated priority levels per GO 95 Rule 18 (levels 1, 2, 3). Upon request of the

¹¹⁹ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-25, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

¹²⁰ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 191, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹²¹ Data Request 259, question 44; attachment “44. 2023 Work Orders.xlsx.”

work order priority levels, BVES stated that “in 2023, BVES did not record the GO 95, Rule 18 severity level for every single work order. The only time BVES documented the severity level was during inspection programs.”¹²² As GO 95 Rule 18 resolution timeframes vary depending on priority level designation, the rating of each work order’s priority level was needed to assess BVES’s completion of this target. GO 95 Rule 18 states:

There shall be 3 priority levels.

(i) Level 1:

- 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.

(ii) Level 2:

- Variable (non-immediate high to low) safety and/or reliability risk.
- Take action to correct within specified time period (fully repair, or by temporarily repairing and reclassifying the condition to a lower priority).
- Time period for correction to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for nonconformances that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for nonconformances that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for nonconformances that compromise worker safety; and (4) 59 months for all other Level 2 nonconformances.

(iii) Level 3:

- Acceptable safety and/or reliability risk.
- Take action (re-inspect, re-evaluate, or repair) as appropriate.

The provided information indicated that all 2023 work orders were resolved within the timelines specified in GO 95 Rule 18 for priority levels 2 and 3. However, since priority levels were not assigned to each work order, Energy Safety was unable to confirm whether any of the 73 work orders, which took BVES between two to 18 days to resolve, met the criteria for a priority 1 work order under GO 95 Rule 18. Priority 1 work orders should have been resolved within one day of being created. BVES did not provide the priority level information for all 2023 work orders and therefore it did not demonstrate that all work orders were resolved within the required timeframes. BVES must address in its corrective action plan how it will

¹²² Data Request 277, question 16; attachment “Energy Safety DR-277 Response.pdf,” p. 5.

track work order priority levels in the future to ensure compliance with GO 95 Rule 18 timeframes.

Conclusion: BVES did not provide information consistent with the completion of work identified in this statement.

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 9

Statement: “LiDAR survey findings are rated in accordance with GO 95 Rule 18 (level 1, 2, or 3) and entered into the distribution inspection GIS database. Level 1 findings are reported immediately to the Field Operations Supervisor who will direct corrective action as soon as possible to resolve the issue or reduce its severity to Level 2 so that more time is available to perform permanent corrective action.”¹²³ And:

The severity will dictate the timeframe for remediation. For vegetation related discrepancies timeframe and example situations are as follow:

- Level 1 – Immediate Action – Vegetation Order Issued to Contractor for Immediate Action
 - Vegetation contacting, nearly contacting or arcing to high voltage conductor, vegetation contacting low voltage conductor and compromising structure, etc.
- Level 2 – Action within 30 days – Vegetation Order Issued to Contractor for Action within 30 days
 - Vegetation within 48 inches of high voltage lines, vegetation causing strain or abrasion on low voltage conductor, tree or portions of tree that are dead, rotten, or diseased that may fall into power lines, etc.
- Level 3 – Non-urgent Normal Cycle Action – Vegetation Order issued to Contractor for action during the next normal vegetation cycle.¹²⁴

Supporting Information and Analysis: BVES provided an Excel file which documented 121 vegetation compliance discrepancies identified during LiDAR inspections in 2023.¹²⁵ The Excel file included the dates each discrepancy was confirmed, the priority level of each discrepancy (level 1, 2, 3), and the date work was completed to address each discrepancy.

¹²³ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), pp. 199-200, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹²⁴ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 216, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹²⁵ Data Request 259, question 13; attachment “13. 2023 LiDAR confirmed findings.xlsx.”

The Excel file indicated that level 3 vegetation compliance discrepancies were remediated within the timeframes stated in BVES's 2023-2025 WMP. However, level 1 and 2 discrepancies were not. Of the 26 level 1 findings listed in the Excel file, three were remediated 55 to 56 days after the reported inspection dates. Additionally, of the 93 level 2 discrepancies listed in the Excel file, 81 were remediated between 44 to 59 days after the reported inspection date. Based on the provided information, BVES did not complete remediation work to address all LiDAR findings within the timeframes stated in BVES's 2023-2025 WMP.

Conclusion: BVES did not provide information consistent with the completion of work identified in this statement.

Statement 10

Statement: "3rd Party Ground Patrol Inspection findings are rated in accordance with GO 95 Rule 18 (Level 1, 2, or 3) and entered into the distribution inspection GIS database. Level 1 findings are reported immediately to the Field Operations Supervisor who will direct corrective action as soon as possible to resolve the issue or reduce its severity to Level 2 so that more time is available to perform permanent corrective action."¹²⁶ And:

The severity will dictate the timeframe for remediation. For vegetation related discrepancies timeframe and example situations are as follow:

- Level 1 – Immediate Action – Vegetation Order Issued to Contractor for Immediate Action
 - Vegetation contacting, nearly contacting or arcing to high voltage conductor, vegetation contacting low voltage conductor and compromising structure, etc.
- Level 2 – Action within 30 days – Vegetation Order Issued to Contractor for Action within 30 days
 - Vegetation within 48 inches of high voltage lines, vegetation causing strain or abrasion on low voltage conductor, tree or portions of tree that are dead, rotten, or diseased that may fall into power lines, etc.
- Level 3 – Non-urgent Normal Cycle Action – Vegetation Order issued to Contractor for action during the next normal vegetation cycle.¹²⁷

Supporting Information and Analysis: BVES provided an Excel file, exported from its GIS database, detailing all vegetation compliance discrepancies discovered during 3rd party

¹²⁶ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), pp. 200-201, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹²⁷ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 216, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

ground patrol inspections in 2023. The Excel file included notes describing the identified vegetation compliance discrepancies, and the dates when remediation work was completed to address the discrepancies.¹²⁸ The Excel file indicated that six discrepancies were identified in 2023 related to the presence of vegetation within 4 feet of primary lines.

BVES stated that its contractor delivered the vegetation compliance discrepancy data discovered during 3rd party ground patrol inspections to BVES on December 13, 2023.¹²⁹ Based on this date and the remediation dates listed in the Excel file, all discrepancies were addressed within 40 days of BVES receiving the data from the contractor. The Excel file did not include associated priority level information for the discrepancies. However, based on the notes in the Excel file, the discrepancies match the criteria described for priority level 2 discrepancies which are required to be remediated within 30 days per BVES's 2023-2025 WMP.

The provided information did not support that BVES rated and assigned priority levels to vegetation compliance findings that were discovered during 3rd party ground patrol inspections or that BVES followed the timeframes stated in its 2023-2025 WMP to address the identified discrepancies.

Conclusion: BVES did not provide information consistent with the completion of work identified in this statement.

Statement 11

Statement: "BVES will begin populating its vegetation work order enterprise system to track work orders in the second quarter of 2023."¹³⁰

Supporting Information and Analysis: BVES provided a screenshot from its vegetation work order enterprise system, iRestore, which showed a log of vegetation management work orders from 2023.¹³¹ The screenshot indicated that BVES began entering vegetation work orders into the iRestore system in 2023 to track the initiation and completion of vegetation management work.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

¹²⁸ Data Request 259, question 16; attachment "16. 3rd Party ground patrol VM findings.xlsx."

¹²⁹ Data Request 277, question 17; attachment "Energy Safety DR-277 Response.pdf," p. 6.

¹³⁰ [BVES's 2023-2025 WMP](#) (Rev. #2, Nov. 16, 2023), p. 216, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true>).

¹³¹ Data Request 259, question 45; attachment "40. iRestore work orders.pdf."

Finding- 8.2.6: Open Work Orders

BVES did not provide information consistent with the completion of all work identified in Initiative 8.2.6 Open Work Orders. BVES must supply a corrective action plan addressing the deficiency identified in its open work orders target as well as Statements 9 and 10.

8.2.7 Workforce Planning

The purpose of this initiative was to describe “Programs to ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work.”¹³²

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

BVES provided the following workforce planning narrative target in its 2023-2025 WMP.¹³³ Because it was included in BVES’s target table, it is summarized in the table below to be consistent with the structure of BVES’s WMP.

Initiative Activity	BVES’s 2023 Target	Completed in 2023
Workforce Planning	Verify staffing level for wildfire related activities	Achieved

Supporting Information and Analysis: BVES provided its Policy of Fuel Management and Reduction of Slash Procedure which sets requirements and guidelines to which BVES and contracted staff must adhere.¹³⁴ The procedure states that “during a major storm event or other disaster, contractor shall be capable of working extended hours and on weekends and holidays as necessary to clear lines as directed by BVES Representative.”¹³⁵ The procedure indicated that BVES set requirements for its contractor to respond to a disaster event such as a wildfire with appropriate staffing levels should the need arise.

¹³² [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-26, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

¹³³ [BVES’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 192, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹³⁴ Data Request 277, question 19; attachment “21. Policy of Fuel Management and Reduction of Slash.pdf.”

¹³⁵ Data Request 277, question 19; attachment “21. Policy of Fuel Management and Reduction of Slash.pdf.”

Additionally, BVES provided a completed work approval form documenting the hours and units of emergency vegetation clearance work performed by contracted crews in response to a storm event in February 2023.¹³⁶ The form indicated that BVES's contractor was ready to respond to a disaster event by deploying crews to work emergency shifts during a winter storm in 2023.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 12

Statement: Table 8-20 "Vegetation Management Qualifications and Training" included in BVES's 2023-2025 WMP set a "special certification requirement" for all of BVES's contracted Tree Trim General Foreman/Supervisors, and Tree Trimmer positions to be ISA certified and have completed Line-Clearance Qualified Tree-Trimming training."¹³⁷

Supporting Information and Analysis: BVES provided an Excel file containing training records for all 2023 contracted Tree Trim General Foreman/Supervisors and staff. The Excel file indicated that all contracted tree crew staff received training related to tree trimming line clearance work such as tree felling, chainsaw operations, aerial rescue, tree climbing, and rigging in 2023.¹³⁸ However, BVES stated that only its Contract Forester held an ISA certification in 2023.¹³⁹ The provided information indicated that BVES's contracted Tree Trim General Foreman/Supervisors, and Tree Trimmers did not hold the "Special Certification Requirements" stated in Table 8-20 of BVES's 2023-2025 WMP.

Conclusion: BVES did not provide information consistent with the completion of work identified in this statement.

Statement 13

Statement: "BVES's Field Inspector performs the Detailed Inspections... The Field Inspector works closely with the contracted Forester to ensure he is equipped to properly inspect vegetation around power lines."¹⁴⁰

¹³⁶ Data Request 259, question 38; attachment "38. Storm work order.pdf."

¹³⁷ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), pp. 225-226, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

¹³⁸ Data Request 259, question 47; attachment "47. Contractor's Qualifications.xlsx."

¹³⁹ Data Request 277, question 20; attachment "Energy Safety DR-277 Response.pdf," p. 7.

¹⁴⁰ [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), p. 197, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

Supporting Information and Analysis: BVES provided a sign-in sheet for a vegetation management policies and procedures training session conducted by BVES's Contract Forester in October 2023.¹⁴¹ The sign-in sheet indicated that BVES's field inspector attended the session and received training from the Contract Forester on topics related to vegetation inspections along power lines.

Conclusion: BVES provided information consistent with the completion of work identified in this statement.

Finding- 8.2.7 Workforce Planning

BVES did not provide information consistent with the completion of all work identified in Initiative 8.2.7 Workforce Planning. BVES must supply a corrective action response addressing the deficiency identified in Statement 12 above.

¹⁴¹ Data Request 259, question 4; attachment "4. Vegetation Program Training.pdf."