



April 2, 2025

VIA E-MAIL
OEIS Docket # 2023-SVM

Sheryl Bilbrey
Program Manager | Environmental Science Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Bear Valley Electric Service, Inc 2023 SVM Audit Corrective Actions Plan

Dear Sheryl Bilbrey,

Bear Valley Electric Service, Inc. (BVES or Bear Valley) submits this response pursuant to Office of Energy Infrastructure Safety (OEIS or Energy Safety) Report of Audit on Bear Valley Electric Service Inc's, 2023 Vegetation Management Work dated March 3, 2025. Energy Safety's 2023 Substantial Vegetation Management Audit Report (SVM Report) noted three findings that required Bear Valley to provide a response and corrective action plan. The following provides Bear Valley's responses and corrective action plans for the findings.

Findings and Corrective Actions

Initiative Number:	8.2.3.1 Pole Clearing
Findings:	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.

Statement 1: Per the SVM Report 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 it with exempt equipment as soon as possible. If the equipment cannot be changed out, BVES will then conduct pole brushing on the pole." 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.

Corrective Action: BVES will establish a process to document and maintain records of each occurrence of when non-exempt equipment is identified and replaced. Also, records will be maintained for pole clear activities. This process will be in place by July 1, 2025. Additionally, as part of BVES's 2026-2028 WMP, BVES has developed a plan to conduct pole brushing on a selected number of poles that have either non-exempt equipment or are in extreme fire threat areas (High Fire Threat District (HFTD) Tier 3)

beginning in 2026. As poles are identified with non-exempt equipment installed through inspections, they will be added to the annual pole brushing program.

Initiative Number:	8.2.6 Open Work Orders
Findings:	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.

Per the SVM Report, “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 track work order priority levels in the future to ensure compliance with GO 95 Rule 18 timeframes.”

OEIS provided two statements in the SVM Report that BVES must address with corrective action – Statement 9 and Statement 10.

Statement 9: Per the SVM Report, OEIS noted for LiDAR findings “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.”

Corrective Action: BVES contracts out the LiDAR inspection and the vendor sends the inspection report as a complete inspection package of findings for the entire overhead system. This means BVES receives all of the findings at once. This imposes a significant challenge to BVES’s ability to conduct corrective action in the required timeframes due to its small workforce having to process all the findings in a short period of time. As corrective action to this issue, BVES is requiring the LiDAR contractor to provide LiDAR findings as soon as the analysis for each individual circuit is completed instead of waiting until all of the complete survey analysis of the entire BVES overhead system is finished. Additionally, BVES is requesting the contractor notify it immediately of any Level 1 findings. With this change in procedures, BVES will be able to inspect findings and complete vegetation work orders within the proper timeframes. These changes will be implemented for the 2025 LiDAR inspection.

Statement 10: Per the SVM Report, OEIS noted that “BVES provided an Excel file, exported from its GIS database, detailing all vegetation compliance discrepancies discovered during 3rd party 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. 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.

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."

Corrective Action: BVES contracts out its 3rd Party Ground Patrol Inspection. BVES recently awarded the 3rd Party Ground Patrol Inspection contract to a different contractor from the one that conducted the 2023 3rd Party Ground Patrol Inspection. As a corrective action to this finding, during the kick-off meeting with the new 3rd Party Ground Patrol Inspection contractor for the 2025 inspection, BVES will go over the priority levels for vegetation findings and ensure the inspectors understand how to properly assign each vegetation finding and to report immediately any Level 1 findings. BVES will also conduct a meeting with the forester and the vegetation management crew once the 3rd Party Ground Patrol Inspection findings are provided so that all responsible parties are aware of the findings, the priority levels assigned to each finding, the due dates for resolving the findings, and develop a plan to address the findings within the required timeframes. Additionally, the Wildfire Mitigation and Reliability Engineer will follow up to confirm all corrective actions to the findings are completed within the required timeframes.

Initiative Number:	8.2.7 Workforce Planning
Findings:	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.

OEIS provided one statement that BVES must address with corrective action – Statement 12.

Statement 12: BVES stated in its 2023-2025 WMP, Table 8-20, that all of BVES's contracted Tree Trim General Foreman/Supervisors, and Tree Trimmer positions should be ISA certified. In statement 12, OEIS identified that these contracted vegetation management employees did not hold an ISA certification.

Corrective Action: BVES has determined that the requirement it had imposed in Table 8-20 for contracted Tree Trim General Foreman/Supervisors and Tree Trimmer positions be ISA certified was overly burdensome, not required, and not realistic. Therefore, BVES has since deemed that it is not necessary for these positions to hold this certification. BVES has removed ISA certification from being required for Tree Trim and General Foreman/Supervisor and contracted Tree Trimmer. It should be noted that BVES's Forester is ISA certified and the forester inspects 100% of all vegetation management activities.

If you have any questions concerning this audit, please contact Jared Hennen, Wildfire Mitigation and Reliability Engineer, at Jared.Hennen@bvesinc.com or 909.255.2948.

Sincerely,

//S//

Paul Marconi
President, Treasurer & Secretary
Bear Valley Electric Service, Inc.

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