



June 17, 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 Report on Bear Valley Electric Service, Inc's 2023 Substantial Vegetation Management Audit**

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its final report on Bear Valley Electric Service, Inc's (BVES) 2023 Substantial Vegetation Management (SVM) audit. Energy Safety finds that BVES substantially complied with the substantial portion of the vegetation management requirements in its 2023-2025 Wildfire Mitigation Plan.

The attached report follows Energy Safety's publication of its SVM audit on March 3, 2025, and BVES's subsequent response on April 2, 2025. Pursuant to statutory requirements, a copy of this report is issued to BVES, published on Energy Safety's 2023 SVM Docket<sup>1</sup> and provided to the California Public Utilities Commission.

Sincerely,

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

Cc:  
Karen McLaughlin, Energy Safety  
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Leslie Palmer, CPUC  
Jarred Hennen, BVES  
Tom Tzu-Tong Chou, BVES

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<sup>1</sup> 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 REPORT**  
**BEAR VALLEY ELECTRIC SERVICE, INC.**

June 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's) vegetation management commitments from its approved 2023-2025 Wildfire Mitigation Plan (WMP) on March 3, 2025.<sup>1</sup>

The BVES 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas.<sup>2</sup> In the BVES Substantial Vegetation Management Audit (SVM Audit), 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.

BVES submitted its Corrective Action Plan (CAP) addressing the deficiencies identified in the SVM Audit on April 2, 2025.<sup>3</sup> Based on an analysis of BVES's CAP as well as the analysis in the 2023 SVM Audit, Energy Safety found that BVES substantially complied with one of the three deficient initiatives by supplying information and clarifications that demonstrated that BVES completed the majority of the work and achieved the program objective.

Given that the 2023 SVM Audit found that BVES completed all work in 10 initiatives and this analysis found that it substantially complied with one of the deficient initiatives, BVES substantially complied with a total of 11 of the 13 vegetation management initiatives. Thus, Energy Safety found that programmatically, BVES substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

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<sup>1</sup> [Energy Safety's 2023 SVM Audit of BVES](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true) (March 3, 2025),  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true>).

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

<sup>3</sup> [BVES's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true) (April 2, 2025),  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true>).

# 1. INTRODUCTION

Pursuant to Public Utilities Code section 8386.3(c)(5), Energy Safety must annually audit the vegetation management work performed by, or on behalf of, an electrical corporation. The SVM Audit shall specify any failure of the electrical corporation to fully comply with the vegetation management commitments in its Wildfire Mitigation Plan (WMP).<sup>4</sup> Energy Safety then provides the SVM Audit to the electrical corporation and grants it a reasonable time to correct and eliminate any deficiency therein. The electrical corporation submits its response to the SVM Audit in a Corrective Action Plan (CAP). Following receipt and review of the electrical corporation's CAP, Energy Safety completes an analysis of the CAP and issues an Audit Report to the electrical corporation identifying whether it substantially complied with a substantial portion of the vegetation management requirements in the compliance year.<sup>5,6</sup>

Energy Safety published the 2023 BVES SVM Audit on March 3, 2025.<sup>7</sup> The Audit concluded that BVES did not perform all the work specified in three out of the 13 vegetation management initiatives in its 2023-2025 WMP. In response to the SVM Audit, BVES submitted its CAP on April 2, 2025.<sup>8</sup> Energy Safety reviewed BVES's CAP and supporting information to determine whether it substantially complied with the substantial portion of their vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

This document is Energy Safety's Report on the 2023 SVM Audit of BVES. The document is organized as follows:

- Section 2 is a summary of the 2023 SVM findings published in the February 18, 2025, audit.
- Section 3 includes Energy Safety's initiative level (3.1) and programmatic (3.2) compliance analysis of BVES's CAP and supporting documentation and information.
- Section 4 provides the basis for Energy Safety's conclusion that BVES substantially complied with the substantial portion of the vegetation management requirements in its 2023-2025 WMP.

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<sup>4</sup> Pub. Util. Code, § 8386.3(c)(5)(A).

<sup>5</sup> Pub. Util. Code, § 8386.3(c)(5)(C).

<sup>6</sup> [2024 Compliance Guidelines](#), Section 8.1, (September 2024), p. 13.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57320&shareable=true>).

<sup>7</sup> [Energy Safety's 2023 SVM Audit of BVES](#) (March 3, 2025),

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true>).

<sup>8</sup> [BVES's 2023 SVM Audit CAP](#) (April 2, 2025),

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true>).

## 2. 2023 SVM AUDIT FINDINGS

The 2023 SVM Audit found that BVES performed all work in 10 of the 13 initiatives and was deficient in the remaining three. Table 1 below is reproduced from Energy Safety’s 2023 SVM Audit.<sup>9</sup>

*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
<b>8.2.3. Vegetation and Fuels Management</b>	<b>8.2.3.1 Pole Clearing</b>	<b>Did not complete all work</b>
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 Right-of-Ways	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 and Quality Control	Completed all work
<b>8.2.6 Open Work Orders</b>	<b>8.2.6 Open Work Orders</b>	<b>Did not complete all work</b>
<b>8.2.7 Workforce Planning</b>	<b>8.2.7 Workforce Planning</b>	<b>Did not complete all work</b>

<sup>9</sup> [Energy Safety’s 2023 SVM Audit of BVES](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true) (March 3, 2025), pp. 4-5, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true).

### 3. SVM COMPLIANCE ANALYSIS

Energy Safety must assess whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the compliance year.<sup>10</sup> The determination of substantial compliance is based on an analysis of both the electrical corporation's compliance with each vegetation management initiative as well as the program overall.

The initiative level analysis includes:

- 1) **Achievement of Objective-** Determination of whether the electrical corporation's deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation's ability to achieve the objectives of its vegetation management programs; and
- 2) **Good Faith Effort-** Determination of whether the electrical corporation's effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP.

The programmatic level analysis includes:

- 3) **Completeness-** Determination of whether the electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.

Energy Safety synthesizes the initiative and programmatic analyses to formulate the conclusion regarding substantial compliance with the substantial portion of the vegetation management requirement in BVES's WMP, which is described in Section 4.

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<sup>10</sup> Pub. Util. Code, § 8386.3(c)(5)(C).

### 3.1 Initiative Level Assessment

#### Summary of Initiative Level Compliance

Table 2 includes the three initiatives from BVES’s 2023-2025 WMP for which Energy Safety’s 2023 SVM Audit found that BVES did not complete all work. The table includes Energy Safety’s determination of substantial compliance for each initiative based on the analysis below. Energy Safety found that BVES substantially complied with one of the three deficient initiatives.

*Table 2. Energy Safety's determination of substantial compliance*

Vegetation Management Initiative with Deficiency	Determination of Substantial Compliance
8.2.3.1 Pole Clearing	Did not substantially comply
8.2.6 Open Work Orders	Did not substantially comply
8.2.7 Workforce Planning	Substantially complied

### 8.2.3.1 Vegetation and Fuels Management- Pole Clearing

#### Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to describe the “Plan and execution of vegetation removal around poles per Public Resources Code (PRC) section 4292 and outside the requirements of PRC section 4292 (e.g., pole clearing performed outside of the State Responsibility Area).”<sup>11</sup> In its 2023-2025 WMP, BVES committed to clearing all flammable material and vegetation in a 10-foot radius around the base of poles or structures that have equipment that is non-exempt from PRC section 4292 requirements and clearing vegetation around poles with exempt equipment where possible.<sup>12</sup>

#### 2023 SVM Audit Finding

BVES stated in response to Data Request 259 that it did not perform any pole brushing (efforts to remove flammable vegetation around the base of poles or structures that have utility equipment) in 2023. Instead, BVES focused on collecting data to identify which poles in its system had PRC section 4292 non-exempt equipment.<sup>13</sup> BVES stated that it replaces non-exempt equipment with exempt equipment when it is found in the field. If the replacement cannot be done promptly, pole brushing is conducted.<sup>14</sup> However, BVES was unable to provide any documentation demonstrating that: (1) it had knowledge of the PRC section 4292 exemption status of its equipment; (2) it replaced non-exempt equipment with exempt equipment, and (3) it conducted pole brushing when timely replacement of equipment was not possible in compliance year 2023.<sup>15</sup> Therefore, BVES did not demonstrate that it completed the work identified in this initiative.

#### BVES’s CAP Response

In its CAP, BVES stated:

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

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<sup>11</sup> [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).

<sup>12</sup> [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).

<sup>13</sup> Data Request 259, question 19; attachment “Energy Safety DR-259 Response.pdf,” p. 6.

<sup>14</sup> [Energy Safety's 2023 SVM Audit of BVES](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true) (March 3, 2025), p. A-12, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true).

<sup>15</sup> [Energy Safety's 2023 SVM Audit of BVES](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true) (March 3, 2025), p. A-12, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true).

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.<sup>16</sup>

## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

### Criteria 1: Achievement of Objective

BVES's CAP did not dispute Energy Safety's 2023 SVM Audit findings, nor did it provide the additional information requested to verify completion of work. BVES acknowledged the shortfall and indicated that it plans to implement new procedures starting in July 2025 that will allow BVES to document pole clearing activities, and address risk on its system associated with vegetation growing around its pole assets.

Energy Safety requests that BVES continue to track the exemption status of all equipment in its system, document the inspection and replacement of non-exempt equipment, and record all pole clearing work required by its WMP. While BVES's CAP indicates that BVES plans to address the deficiencies identified in the 2023 SVM Audit starting in 2025, without documentation of pole clearing work in 2023, Energy Safety found that BVES did not achieve the objective of Initiative 8.2.3.1 Pole Clearing for this compliance year.

### Criteria 2: Good Faith Effort

BVES stated in its response to Data Request 259 that “[i]n 2023[,] BVES did not conduct any pole brushing.”<sup>17</sup> Although BVES stated in the same data request response that it focused on collecting data to identify which poles in its system had non-exempt equipment and that it replaces non-exempt equipment with exempt equipment when it is found in the field, BVES could not provide documentation of these activities.<sup>18</sup> BVES's failure to perform pole clearing work or keep accurate records of the exemption status of its equipment did not demonstrate a good faith effort to complete the objective of this initiative. However, BVES's commitment to implement a process to collect this data starting in July 2025 does indicate a good faith effort to improve recordkeeping in future compliance years.

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<sup>16</sup> [BVES's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true) (April 2, 2025), pp. 1-2, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true).

<sup>17</sup> Data Request 259, question 19; attachment “Energy Safety DR-259 Response.pdf,” p. 6.

<sup>18</sup> [Energy Safety's 2023 SVM Audit of BVES](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true) (March 3, 2025), p. A-12, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true).

### Initiative Level Determination

The objective of this initiative is to mitigate ignition risk around BVES's pole assets through vegetation removal. BVES's 2023-2025 WMP included commitments to perform such work, but it stated in response to Data Request 259 that no such work was completed in 2023.<sup>19</sup> Because BVES did not perform any pole clearing work in 2023 nor did it provide documentation to demonstrate that it otherwise addressed risk related to vegetation surrounding its pole assets, Energy Safety found that BVES did not substantially comply with this initiative.

BVES's CAP indicates that it plans to make improvements to its pole clearing program starting in 2025 to address the deficiencies identified in the 2023 SVM Audit. Energy Safety will assess those improvements in future compliance years.

## 8.2.6 Open Work Orders

### Summary of Initiative Work Commitments and Activities

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."<sup>20</sup> In its 2023-2025 WMP, BVES made a commitment to complete all vegetation management work orders within California Public Utilities Commission's General Order 95 (GO 95) timeframes and committed to specific timeframes to resolve any vegetation compliance discrepancies identified during inspections based on priority.<sup>21</sup>

### 2023 SVM Audit Finding

Energy Safety found that BVES completed all work orders created in 2023 and met its commitment to begin utilizing its work order enterprise system to track work orders in 2023. However, BVES did not meet its commitment to prioritize and complete all open work orders, vegetation discrepancies identified during LiDAR inspections, and discrepancies identified during 3<sup>rd</sup> Party Ground Patrol Inspections within its targeted timeframes.

BVES committed to completing all vegetation management work orders within the timeframes specified by GO 95, which sets deadlines based on priority levels determined by

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<sup>19</sup> Data Request 259, question 19; attachment "Energy Safety DR-259 Response.pdf," p. 6.

<sup>20</sup> [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).

<sup>21</sup> [BVES's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true) (Rev. #2, Nov. 16, 2023), pp. 191, 216, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55979&shareable=true).

the relative risk vegetation presents to infrastructure. BVES included response times which were more rapid than GO 95 for some instances, providing the following timeframes and example situations for prioritizing work orders in its 2023-2025 WMP: Level 1 work orders require immediate action as in cases where vegetation is contacting infrastructure; Level 2 are non-critical and should be resolved within 30 days; and Level 3 are non-urgent issues that can be handled during the next normal vegetation cycle.<sup>22</sup> While 2,368 of the 2,441 (97%) work orders were created and closed on the same day, 73 work orders were completed between two and 18 days after the work orders were created and BVES did not track associated priority levels for each work order per GO 95 Rule 18 (levels 1, 2, 3). Consequently, Energy Safety could not confirm whether all work orders were completed within the required timeframes.<sup>23</sup>

Regarding specific commitments to address discrepancies identified during LiDAR and 3<sup>rd</sup> Party Ground Patrol Inspection, BVES also committed to assigning priority levels in accordance with GO 95 Rule 18 (1, 2, 3) priority levels and completing remediation work to address the discrepancies within timeframes specified. However, of the 121 discrepancies identified during LiDAR inspections in 2023, three priority level 1 discrepancies were remediated 55 to 56 days after they were identified rather than within 24 hours, and 81 priority level 2 discrepancies were remediated 44 to 59 days after the discrepancies were identified, rather than within 30 days.<sup>24</sup> BVES's documentation indicated that six vegetation compliance discrepancies were identified during 3<sup>rd</sup> Party Ground Patrol Inspections in 2023 and BVES did not assign priority levels to these instances.<sup>25</sup>

Given these deficiencies, Energy Safety found that BVES did not provide information consistent with the completion of all work identified in initiative 8.2.6 Open Work Orders.

## BVES's CAP Response

In its CAP response, BVES did not dispute the findings in the 2023 SVM Audit. BVES provided corrective measures to ensure the targeted time frames are achieved in the future. However, the corrective measures BVES provided in its CAP addressed only the deficiencies identified in

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<sup>22</sup> [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).

<sup>23</sup> [Energy Safety's 2023 SVM Audit of BVES](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true) (March 3, 2025), pp. A-28, A-29, A-30, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true).

<sup>24</sup> [Energy Safety's 2023 SVM Audit of BVES](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true) (March 3, 2025), pp. A-30, A-31, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true).

<sup>25</sup> [Energy Safety's 2023 SVM Audit of BVES](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true) (March 3, 2025), pp. A-31, A-32, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true).

BVES's LiDAR and 3<sup>rd</sup> Party Ground Patrol Inspection programs, but did not address the larger prioritization deficiency for most of its open work orders.<sup>26</sup>

Regarding its corrective measures for vegetation deficiencies identified during LiDAR inspections, BVES stated that it contracts out its LiDAR inspections, and that the vendor provides one report containing all inspection results only after BVES's entire overhead system has been inspected and the data has been processed. Further, BVES stated that because the findings are provided to BVES all at once, it creates a significant challenge for BVES to conduct corrective actions to address the discrepancies in the timeframe requirements included in its 2023-2025 WMP due to BVES's small work force.<sup>27</sup> In its CAP, BVES committed to requiring its LiDAR vendor to provide LiDAR results to BVES as soon as the analysis for each individual circuit in BVES's system is completed instead of waiting for the complete survey analysis of the entire system to be finished. Further, BVES stated that this change in procedure will allow it to verify LiDAR results and perform corrective actions within the timeframes described in its 2023-2025 WMP and these changes will be implemented in 2025.<sup>28</sup> Regarding vegetation discrepancies identified during 3<sup>rd</sup> Party Ground Patrol Inspections, BVES stated that it awarded the contract to a new vendor in 2025.<sup>29</sup> As corrective measures, BVES stated in its CAP that:

...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.<sup>30</sup>

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<sup>26</sup> [BVES's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true) (April 2, 2025), p. 2, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true).

<sup>27</sup> [BVES's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true) (April 2, 2025), p. 2, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true).

<sup>28</sup> [BVES's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true) (April 2, 2025), p. 2, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true).

<sup>29</sup> [BVES's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true) (April 2, 2025), p. 3, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true).

<sup>30</sup> [BVES's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true) (April 2, 2025), p. 3, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true).

## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

### Criteria 1: Achievement of Objective

The objective of this initiative was to manage open work orders related to vegetation management work. BVES ultimately completed all vegetation management work orders and met its commitment to begin utilizing its work order enterprise system to track work orders in 2023. However, the work orders were not managed as described in BVES's 2023-2025 WMP. BVES stated in its CAP that it plans to implement new procedures to ensure that vegetation management work orders are prioritized and completed within the timeframes described in its 2023-2025 WMP. BVES's delay in responding to some vegetation compliance discrepancies in compliance year 2023 detracted from BVES's ability to reduce risk on its system. Additionally, without assigning priority levels to vegetation work orders as required by its WMP, neither BVES nor Energy Safety could verify if BVES met the requirements of its open work order target in 2023. These deficiencies detracted from BVES's ability to achieve the objective of this initiative.

### Criteria 2: Good Faith Effort

Energy Safety acknowledges that BVES has limited resources to complete vegetation management work orders. However, BVES must take this into consideration when planning work to complete its WMP commitments so that it can best leverage its limited resources and effectively reduce risk on its system. BVES set requirements in its WMP without procedures in place to achieve the stated requirements or ensure validation of those requirements which does not demonstrate a good faith effort to meet the requirements of this initiative. However, BVES's CAP indicates that it plans to implement new procedures starting in 2025 to address the deficiencies identified in the 2023 SVM Audit. Energy Safety will assess BVES's implementation of those procedures in future compliance years.

### Initiative Level Determination

Due to record-keeping deficiencies, neither BVES nor Energy Safety could verify that BVES completed all vegetation management work orders within the timeframes specified by its WMP. Consequently, Energy Safety was unable to verify that BVES met its open work order target in 2023. Additionally, BVES did not fully address all vegetation compliance discrepancies identified by its LiDAR and 3<sup>rd</sup> Party Ground Patrol Inspection programs within the timeframe requirements outlined in its 2023-2025 WMP in 2023. Energy Safety expects BVES to implement the procedures described in its CAP to address these deficiencies in future compliance years. Energy Safety concluded that BVES did not substantially comply with this initiative for compliance year 2023.

## 8.2.7: Workforce Planning

### Summary of Initiative Work Commitments and Activities

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.”<sup>31</sup> In its 2023-2025 WMP, BVES included a workforce planning target to verify staffing levels for wildfire related activities.<sup>32</sup> BVES also included a narrative commitment to ensure BVES’s field inspector was equipped to properly inspect vegetation around power lines.<sup>33</sup> Lastly, BVES set a requirement for its contracted Tree Trim General Foreman/Supervisors, and Tree Trimmer positions to be International Society of Arboriculture (ISA) certified.<sup>34</sup>

### 2023 SVM Audit Finding

Energy Safety found that BVES completed all work identified in its workforce planning target and narrative commitment. However, BVES’s Tree Trim General Foreman/Supervisors, and Tree Trimmers did not hold ISA certification in 2023, therefore, BVES did not provide information consistent with the completion of all work identified in Initiative 8.2.7 Workforce Planning.<sup>35</sup>

### BVES’s CAP Response

BVES stated in its CAP that:

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

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<sup>31</sup> [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).

<sup>32</sup> [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).

<sup>33</sup> [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).

<sup>34</sup> [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).

<sup>35</sup> [Energy Safety's 2023 SVM Audit of BVES](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true) (March 3, 2025), Section 8.2.7 Workforce Planning, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true).

Forester is ISA certified, and the forester inspects 100% of all vegetation management activities.<sup>36</sup>

### Criteria 1: Achievement of Objective

BVES was able to demonstrate that its contracted vegetation management staff received training related to tree trimming line clearance work such as tree felling, chainsaw operations, aerial rescue, tree climbing, and rigging in 2023.<sup>37</sup> BVES agreed that its contracted Tree Trim General Foreman/Supervisors and Tree Trimmer positions were not ISA certified in 2023. However, Energy Safety concluded that the training that was completed by these positions ensured that BVES's contracted vegetation management staff were trained to perform vegetation management work in 2023. Thereby achieving the objective of this initiative.

### Criteria 2: Good Faith Effort

Energy Safety found that the training completed by BVES's vegetation management contractors demonstrated a good faith effort by BVES to ensure its contractors were trained to perform vegetation management work. However, BVES's statement in its CAP which describes a requirement in its 2023–2025 WMP as unnecessary, does not demonstrate a good faith effort by BVES to include training requirements in its WMP that effectively reduce risk on BVES's system.

### Initiative Level Determination

While BVES's contracted Tree Trim General Foreman/Supervisors and Tree Trimmer positions did not hold ISA certifications in 2023, BVES demonstrated that personnel in these roles completed training relevant to completing vegetation management work safely and effectively. In addition, BVES met its workforce planning target and demonstrated that its field inspector was provided training related to inspecting vegetation near power lines.

In its CAP, BVES stated that its Forester is ISA certified and inspects 100% of vegetation management activities. While Energy Safety confirmed the Forester's ISA certification during the SVM Audit, it did not verify whether the Forester inspected all vegetation management activities in 2023. Because BVES did not provide supporting documentation

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<sup>36</sup> [BVES's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true) (April 2, 2025), p. 3, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true).

<sup>37</sup> [Energy Safety's 2023 SVM Audit of BVES](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true) (March 3, 2025), p. A-34, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true).

to confirm this statement, Energy Safety did not consider the impact of this activity in its evaluation of the initiative.

Energy Safety acknowledges that BVES's contractors received training applicable to their vegetation management responsibilities. However, Energy Safety is required to audit the requirements in BVES's 2023–2025 WMP, which currently includes ISA certification as a requirement. Accordingly, Energy Safety will continue to request documentation demonstrating that BVES's vegetation management contractors possess ISA certifications, unless and until the WMP is revised.

Furthermore, Energy Safety expects BVES to include in its future WMPs requirements that both effectively address risk on BVES's system and optimize the use of available resources. Despite the absence of ISA certification among its contracted vegetation management staff in 2023, Energy Safety concluded that BVES substantially complied with this initiative by completing the majority of the activities described.

## 3.2 Programmatic Assessment

Energy Safety's Audit document, dated March 3, 2025, found that BVES completed all work in 10 of the 13 initiatives in its 2023-2025 WMP and was deficient in three. BVES's CAP, dated April 2, 2025, provided sufficient documentation to demonstrate substantial compliance for one of the three initiatives identified in the SVM Audit. However, BVES was unable to demonstrate that it completed a substantial amount of the work described in two of the three deficient initiatives in 2023: Pole Clearing and Open Work Orders.

Energy Safety expects BVES to implement the plans described in its CAP to ensure risk related to vegetation surrounding its pole assets is effectively addressed, and to ensure that vegetation management work orders are prioritized and completed within timeframes that reduce risk on BVES's system. Energy Safety also expects BVES to include requirements in its future WMPs that best leverage BVES's resources and effectively reduce risk.

Overall, Energy Safety finds that BVES has substantially complied with 11 of its 13 vegetation management initiatives. Therefore, BVES completed the majority of the work described in its 2023-2025 WMP, has identified deficiencies in its program, and has begun to take actions to correct these deficiencies. As a result, Energy Safety finds that, programmatically, BVES substantially complied with the vegetation management work described in its 2023-2025 WMP for compliance year 2023.

## 4. Conclusion

Based upon the analysis discussed in Section 3, Energy Safety concluded that BVES substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

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