Bear Valley Electric Service, Inc. Asset & Inspection Quality Management Plan

June 27, 2025

Approved by: _____

Paul Marconi, President, Treasurer, & Secretary

Contents

1. **Purpose:** To provide policies and procedures to establish an audit process to manage and confirm work completed by employees or subcontractors complies with applicable technical specifications, standards, and codes and meet wildfire mitigation, safety, and reliability objectives.

2. **Scope:** The Quality Management Plan is applicable to all transmission and distribution (T&D) and power generation work with the exception of vegetation management work. A separate document, BVES INC Vegetation Management and Vegetation Management QC Programs Policy and Procedures, outlines the Quality Management Plan for vegetation management work.

3. **Definitions:**

3.1. Quality Assurance (QA) is the part of quality management focused on providing confidence that quality requirements will be fulfilled. The confidence provided by quality assurance is twofold —internally to management and externally to customers, government agencies, regulators, certifiers, and other stakeholders.

3.2. Quality Control (QC) is the part of quality management focused on fulfilling quality requirements. While quality assurance relates to how a process is performed or how a product is made, quality control is more the inspection aspect of quality management.

3.3. Quality Improvement is a set of activities that organizations carry out in order to enhance performance (get better results). Improvement can be achieved by means of a single activity or by means of a recurring set of activities.

3.4. Quality Management (QM) is the coordinated activities to direct and control and the organization with regard to quality.

3.5. Inspection is the process of measuring, examining, and testing to gauge one or more characteristics of a product or service and the comparison of these with specified requirements to determine conformity. Products, processes, and various other results can be inspected to make sure that the object coming off a production line, or the service being provided, is correct and meets specifications.

3.6. External (Contracted) T&D Work is defined as when scope of work where the majority and/or critical tasks are performed by a contractor.

3.7. Internal T&D Work is defined as when scope of work where the majority and/or critical tasks are performed by BVES employees.

3.8. Asset Inspection Work is defined as when the scope of work is associated with asset inspection programs such as Detailed Inspections, Patrol Inspections, UAV Thermography, UAV

HD Photography/Videography, 3rd Party Ground Patrol, Substation Inspection and Intrusive Inspection.

3.9. Power Plant Work is defined as when the scope of work is on the Power Plant engines and/or supporting systems.

3.10. Substation Work is defined as when the scope of work is within the boundaries of a substation.

4. **Overview:** The primary goal of a Quality Management Plan is to ensure that the deliverables from work are of adequate quality and fit-for-purpose. Quality Assurance, Quality Control, and Quality Improvement are integral components of the Quality Management Plan. T&D and power generation work have a direct impact on wildfire mitigations, public and worker safety, and grid resiliency and reliability; therefore, it is essential that work is completed in a manner that is compliant with all applicable technical specifications, standards, and codes.

QA involves thinking about what is required to ensure quality will be achieved, and to set out processes, standards, procedures and/or policies to do that. Typical results of QA are quality plans, inspection and test plans (ITPs), documentation and training. It moves a step up from finding the failures to aiming to prevent or eliminate them. The focus of QA is to provide confidence that requirements and standards are met, and that processes and system have been followed. Some examples of QA:

- A checklist for assembly of product (the procedure/process as a series of steps that must be done).
- A written procedure.
- A set of processes for construction that cover the whole 'life cycle' from getting system requirements, through designing the system, procuring the materials or parts, constructing to applicable standards, testing, and placing in operation.
- A set of processes for a service that cover the whole 'life cycle' from establishing what the system requires, through designing the service, developing and delivering it.

QC is a procedure or set of procedures intended to ensure that a performed service adheres to a defined set of quality criteria or meets the applicable requirements and technical specifications. While QA refers to the confirmation that specified requirements have been met by a product or service, QC refers to the actual inspection of these elements. In order to implement an effective QC program, the organization must decide which specific standards and technical specifications must be met. Then the extent of QC actions must be determined -- for example, the percentage of structures to be inspected for each job and/or the level of detail for each inspection. Next, the results of the QC actions are analyzed to:

- Determine if quality requirements are being fulfilled,
- Expose areas where quality requirements are not being met,

- Identify areas for process improvement even if quality requirements are being fulfilled, and
- Evaluate if QC inspections are sufficient to determine if quality requirements are being fulfilled.

After this, corrective action and/or process improvements must be decided upon and taken, if warranted. Finally, the QC process must be ongoing to ensure that remedial efforts, if required, have produced satisfactory results and to immediately detect recurrences or new instances of trouble.

5. Roles and Responsibilities:

5.1. Utility Engineer and Wildfire Mitigation Manager. Overall responsible for oversight of the quality management program. Table 6-1, BVES QA Process, in Section 6 details specific areas of responsibility.

5.2. Utility Engineer and Wildfire Mitigation Supervisor. Overall responsible for determining work scope, technical specifications, QA/QC requirements, evaluating QC results, and implementing QC requirements. Table 6-1, BVES QA Process, in Section 6 details specific areas of responsibility.

5.3. Field Operations Supervisor. Overall responsible for fieldwork and supporting the Utility Manager and Utility Engineer and Wildfire Mitigation Supervisor in their responsibilities. Table 6-1, BVES QA Process, in Section 6 details specific areas of responsibility.

5.4. Accounting Supervisor. Overall responsible for providing oversight of the procurement of equipment and material and the contracting of labor and services. Table 6-1, BVES QA Process, in Section 6 details specific areas of responsibility.

5.5. Regulatory Compliance Project Engineer. Responsible for supporting the Utility Engineer and Wildfire Mitigation Supervisor as detailed in Table 6-1, BVES QA Process, in Section 6.

5.6. Project Coordinator. Responsible for conducting QC activities as directed and supporting the Utility Engineer and Wildfire Mitigation Supervisor as detailed in Table 6-1, BVES QA Process, in Section 6.

5.7. GIS Specialist. Responsible for updating the GIS to document work completed and for supporting the Utility Engineer and Wildfire Mitigation Supervisor as detailed in Table 6-1, BVES QA Process, in Section 6.

5.8. Field Inspector. Responsible for conducting QC activities as directed and supporting the Utility Engineer and Wildfire Mitigation Supervisor as detailed in Table 6-1, BVES QA Process, in Section 6.

5.9. Substation Technician. Responsible for conducting QC activities as directed and supporting the Utility Engineer and Wildfire Mitigation Supervisor as detailed in Table 6-1, BVES QA Process, in Section 6.

5.10. Senior Power Plant Operator**.** Responsible for conducting QC activities as directed and supporting the Utility Engineer and Wildfire Mitigation Supervisor as detailed in Table 6-1, BVES QA Process, in Section 6.

5.11. Line Crew Foreman. Responsible for conducting QC activities as directed and supporting the Utility Engineer and Wildfire Mitigation Supervisor as detailed in Table 6-1, BVES QA Process, in Section 6.

5.12. Contracts Administrator. Responsible for ensuring qualified contractors are utilized for contracted work and that the contracting is in accordance with the Company's procurement policies as detailed in Table 6-1, BVES QA Process, in Section 6.

5.13. Buyer. Responsible for ensuring qualified vendors are utilized for procurement of equipment and materials, and that the purchasing is in accordance with the Company's procurement policies as detailed in Table 6-1, BVES QA Process, in Section 6.

5.14. Storekeeper. Responsible for receipt inspecting material and equipment to ensure it meets the specifications and quality requirements as required by the Purchase Order. Responsible for ensuring material and equipment is properly stored after receipt in accordance with manufacturer directions. Table 6-1, BVES QA Process, in Section 6 details specific areas of responsibility.

6. **Quality Management:** Table 6-1, BVES QA Process, outlines the standard QA process that BVES follows to achieve the desired quality outcome for T&D and power generation work. Appendix A provides a flowchart of the QA process indicating steps that may be performed in parallel and process improvement loops. Depending on the complexity of the work, the Utility Engineer & Wildfire Mitigation Supervisor may require additional quality steps or may omit quality steps from the QA process as applicable to the specific work scope. Section 7 provides additional guidance on how the QA process is to be implemented.

Table 6-1, BVES QA Process

Quality Step	Activity Description	Staff Involved
1	Determine scope of work (construction, repairs, inspections, etc.).	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor. **Support:** Regulatory Compliance Project Engineer.

Quality Step	Activity Description	Staff Involved
2	Establish applicable work technical specifications, instructions, standards, and material and equipment requirements (Work Order)	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor. **Support:** Regulatory Compliance Project Engineer, Utility Planner, Engineering Technician, & Buyer.
3	Determine qualifications required of personnel performing the scope of work.	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor. **Support:** Field Operations Supervisor.
4	Determine level of in process QC and work closeout and acceptance QC necessary to ensure quality requirements are satisfied.	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor. **Support:** Field Operations Supervisor.
5	Select staff to conduct applicable QC.	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor. **Support:** Field Operations Supervisor.
6	Select qualified contractors (Request for Proposal) and/or staff to conduct the scope of work.	**Responsibility:** Utility Manager **Support:** Utility Engineer & Wildfire Mitigation Supervisor, Field Operations Supervisor, Regulatory Compliance Project Engineer, Accounting Supervisor, & Contracts Administrator.
7	Implement directed in process QC and work closeout QC.	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor **Support (as applicable):** Regulatory Compliance Project Engineer, Engineering Technician, Project Coordinator, Field Inspector, Substation Technician, Senior Power Plant Operator, & Line Crew Foreman
8	Procure material and equipment (Purchase Order).	**Responsibility:** Buyer **Support (as applicable):** Accounting Supervisor
9	Receipt inspects material and equipment and properly store it.	**Responsibility:** Storekeeper **Support (as applicable):** Buyer, Accounting Supervisor
10	Commence work per scope of work.	**Responsibility:** Field Operations Supervisor **Support (as applicable):** Utility Manager, Utility Engineer & Wildfire Mitigation Supervisor, & Project Coordinator
11	Conduct directed in process QC at appropriate process control points.	**Responsibility:** Regulatory Compliance Project Engineer **Support (as applicable):** Engineering Technician, Project Coordinator, Field Inspector, Substation Technician, Senior Power Plant Operator, & Line Crew Foreman
12	Evaluate results of in process QC.	**Responsibility:** Regulatory Compliance Project Engineer **Support (as applicable):** Engineering Technician, Project Coordinator, Field Inspector, Substation Technician, Senior Power Plant Operator, & Line Crew Foreman
13	Determine if corrective action and/or process improvements warranted based on in process QC.	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor **Support (as applicable):** Utility Manager, Field Operations Supervisor, & Project Coordinator.

Quality Step	Activity Description	Staff Involved
14	Take corrective action if warranted based on in process QC.	**Responsibility:** Regulatory Compliance Project Engineer. **Support (as applicable):** Engineering Technician, Project Coordinator, Field Inspector, Substation Technician, Senior Power Plant Operator, & Line Crew Foreman.
15	Implement process improvements if warranted based on in process QC.	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor. **Support (as applicable):** Utility Manager & Field Operations Supervisor.
16	Determine if in process QC is appropriate. If not, implement additional or reduced in process QC as warranted.	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor. **Support (as applicable):** Utility Manager & Field Operations Supervisor.
17	At work reported complete, document work performed (GIS update, work order closing, drawing update, inspection report, etc.).	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor. **Support (as applicable):** Project Coordinator, GIS Specialist, Field Inspector, Substation Technician, Senior Power Plant Operator & Line Crew Foreman.
18	Conduct directed work closeout QC when work is completed.	**Responsibility:** Regulatory Compliance Project Engineer. **Support (as applicable):** Engineering Technician, Project Coordinator, Field Inspector, Substation Technician, Senior Power Plant Operator, & Line Crew Foreman.
19	Evaluate results of work closeout QC.	**Responsibility:** Regulatory Compliance Project Engineer **Support (as applicable):** Engineering Technician, Project Coordinator, Field Inspector, Substation Technician, Senior Power Plant Operator, & Line Crew Foreman
20	Determine if corrective action and/or process improvements warranted based on work closeout QC.	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor **Support (as applicable):** Utility Manager, Field Operations Supervisor, & Project Coordinator.
21	Take corrective action if warranted based on work closeout QC.	**Responsibility:** Regulatory Compliance Project Engineer. **Support (as applicable):** Engineering Technician, Project Coordinator, Field Inspector, Substation Technician, Senior Power Plant Operator, & Line Crew Foreman.
22	If rework is necessary, ensure applicable in process QC and work close QC are conducted as appropriate.	**Responsibility:** Regulatory Compliance Project Engineer **Support (as applicable):** Engineering Technician, Project Coordinator, Field Inspector, Substation Technician, Senior Power Plant Operator, & Line Crew Foreman

Quality Step	Activity Description	Staff Involved
23	Implement process improvements if warranted based on work closeout QC.	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor. **Support (as applicable):** Utility Manager & Field Operations Supervisor.
24	Determine if work closeout QC is appropriate. If not, implement additional or reduced work closeout QC as warranted.	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor. **Support (as applicable):** Utility Manager & Field Operations Supervisor.
25	Closeout Work Order.	**Responsibility:** Utility Engineer & Wildfire Mitigation Supervisor. **Support (as applicable):** Field Operations Supervisor, Accounting Supervisor, Project Coordinator, GIS Specialist, Field Inspector, Substation Technician, Senior Power Plant Operator & Line Crew Foreman.

7. **Additional QM Guidance.** As discussed in Section 6, depending on the complexity of the work, the Utility Engineer & Wildfire Mitigation Supervisor (for T&D work) and Field Operations Supervisor (for Power Plant work) may require additional quality steps or may omit quality steps from the QA process as applicable to the specific work scope. This section provides guidance to be applied when making the determination for what QA will be applied to specific work and activities.

7.1. Equipment and Material.

7.1.1. *Standard Stock Equipment and Material:* The Utility Engineer & Wildfire Mitigation Supervisor shall approve the technical specifications of equipment and material to be maintained in standard inventory stock. Utility Engineer & Wildfire Mitigation Supervisor shall coordinate with the Field Operations Supervisor to determine standard stock minimum and maximum value amounts. Additionally, the Utility Engineer & Wildfire Mitigation Supervisor shall work with the Field Operations Supervisor when determining the specific technical specifications of material to be maintained in stock. The Buyer will place purchase orders for equipment and material to qualified vendors to replenish stock to avoid going below the minimum inventory amounts. The Storekeeper will receipt inspect all standard stock items and report discrepancies to the Buyer and Utility Engineer & Wildfire Mitigation Supervisor. For discrepancies affecting the technical specifications or performance of materials, the Utility Engineer & Wildfire Mitigation Supervisor will direct what corrective action(s) should be taken. For non-technical discrepancies (i.e., wrong amount of material received), the Buyer will direct what corrective action(s) should be taken.

7.1.2. *Non-Standard Stock Equipment and Material:* The Utility Engineer & Wildfire Mitigation Supervisor shall approve the technical specifications of non-standard stock equipment and material prior to purchasing. The Buyer will place purchase orders for the non-standard equipment and material as listed on the approved requisition to qualified vendors. When the equipment and material is received, the Storekeeper will receipt inspect it and will inform the

Utility Engineer & Wildfire Mitigation Supervisor. The Utility Engineer & Wildfire Mitigation Supervisor will determine if an additional receipt inspection is necessary by a Subject Mater Expert. The following additional receipt inspections will be required by the Utility Engineer & Wildfire Mitigation Supervisor at a minimum:

- Substation equipment, capacitor banks, electronic fuse trip savers, and field switches will be receipt inspected by the Substation Technician.
- Distribution overhead and pad mounted transformers will be receipt inspected by a Journeyman Lineman or the Substation Technician.
- IT and communications equipment and material will be inspected by IT staff.
- Weather stations and other digital equipment and sensors will be receipt inspected by IT staff, Substation Technician and/or other SME staff as designated by the Utility Engineer & Wildfire Mitigation Supervisor.
- Meters and meter related equipment and material shall be receipt inspected by the Meter Testman.
- Power Plant equipment and material will be receipt inspected by the Power Plant Senior Operator.

Discrepancies noted in the receipt inspections shall be reported to the Buyer and Utility Engineer & Wildfire Mitigation Supervisor. For discrepancies affecting the technical specifications or performance of materials, the Utility Engineer & Wildfire Mitigation Supervisor will direct what corrective action(s) should be taken. For non-technical discrepancies (i.e., wrong amount of material received), the Buyer will direct what corrective action(s) should be taken.

7.1.3. *Equipment and Material Ordered for Specific Projects:* The Utility Engineer & Wildfire Mitigation Supervisor will direct if any additional SME receipt inspection(s) are necessary in addition to the Storekeeper's receipt inspection for equipment and material ordered to support a specific project. For example, if the equipment and material is the same equipment and material maintained in stock, the Storekeeper's receipt inspection would normally be sufficient. The Utility Engineer & Wildfire Mitigation Supervisor should use the guidance in Section 7.1.2 to determine if additional receipt inspections are necessary.

7.2. Contracted Services. The Utility Manager shall be responsible for contracting for work from qualified contractors by following the Company's procurement policy. In coordination with the Utility Engineer & Wildfire Mitigation Supervisor, Field Operations Supervisor, Accounting Supervisor, and Contracts Administrator, the Utility Manager shall develop the contracted scope of work and issue a Request for Proposal to qualified contractors. The Utility Manager shall follow the Company's procurement policy in selecting the best value bid from qualified contractors and awarding the contract.

7.3. External (Contracted) T&D Work. In coordination with the Field Operations Supervisor, the Utility Engineer & Wildfire Mitigation Supervisor shall approve specific in-process and

closeout QC checks for external T&D work. The Utility Engineer & Wildfire Mitigation Supervisor shall utilize the following guidance:

- Prior to authorizing work, the Utility Engineer & Wildfire Mitigation Supervisor shall review and approve the design, construction drawings, and technical specifications and then issue a Work Order to direct the specified work.
- The Utility Manager shall establish a contract with a qualified contractor per the Company's procurement policy.
- Equipment and material shall be ordered per Section 7.1 above as applicable once the Work Order is opened.
- The Utility Engineer & Wildfire Mitigation Supervisor in coordination with the Field Operations Supervisor shall determine the specific in process and closeout QC checks to be conducted and select the staff that will conduct the QC checks. Generally, QC checks shall be performed by the Field Inspector or a BVES Journeyman Lineman Foreman.
- Staff that will be involved in the QC checks shall review the Work Order.
- Once the Work Order is authorized, equipment and material are received, contract in place for the contracted work, and the work schedule supports the work, the Field Operations Supervisor in coordination with the Project Coordinator will direct the contractor to conduct the work.
- In-process QC checks may be designated to be conducted periodically (for example, daily when work is in progress), randomly (for example, unannounced when work is in progress), as task related inspections (for example, prior to installing a ground rod the BVES inspector must be on site), and/or a combination the later methods.
- Results of in-process QC checks should be reviewed with the Regulatory Compliance Project Engineer and the Utility Engineer & Wildfire Mitigation Supervisor and corrective action directed if necessary.
- Closeout QC checks shall be designed to confirm the as-built drawings, inspect the quality of the workmanship, and ensure that the designated materials were installed. Additionally, the closeout QC checks will include an audit of the Work Order package.
- When work is reported complete, the Field Operations Supervisor shall direct closeout QC checks be conducted.
- Results of closeout QC checks should be reviewed with the Regulatory Compliance Project Engineer and the Utility Engineer & Wildfire Mitigation Supervisor and corrective action directed if necessary.
- Upon receipt of an invoice for the work, the Project Coordinator shall perform a work package audit and validate the materials and work performed. Project Coordinator shall also perform a validation of billing units, and ensures the Field Inspector's verification of work completion and approval for billing. Invoices will not be approved unless the work meets required standards per the scope of work.

The Utility Engineer & Wildfire Mitigation Supervisor shall review the results of in process and closeout QC checks and the completed Work Order package and will direct re-work and/or

other corrective action if necessary. Once, the Utility Engineer & Wildfire Mitigation Supervisor is satisfied the work is of satisfactory quality, the Work Order may be closed out.

7.4. Internal T&D Work. In coordination with the Field Operations Supervisor, the Utility Engineer & Wildfire Mitigation Supervisor shall approve specific in process and closeout QC checks internal T&D work. The Utility Engineer & Wildfire Mitigation Supervisor shall utilize the following guidance:

- Prior to authorizing work, the Utility Engineer & Wildfire Mitigation Supervisor shall review and approve the design, construction drawings, and technical specifications and then issue a Work Order to direct the specified work.
- Equipment and material shall be ordered per Section 7.1 above as applicable once the Work Order is opened.
- The Utility Engineer & Wildfire Mitigation Supervisor in coordination with the Field Operations Supervisor shall determine the specific in process and closeout QC checks to be conducted and select the staff that will conduct the QC checks. Generally, QC checks shall be performed by a BVES Journeyman Lineman Foreman.
- Staff that will be involved in the QC checks shall review the Work Order.
- Once the Work Order is authorized, equipment and material are received, contract in place for the contracted work, and the work schedule supports the work, the Field Operations Supervisor in coordination with the Project Coordinator will direct the BVES crew to conduct the work.
- In-process QC checks may be designated to be conducted periodically (for example, daily when work is in progress), randomly (for example, unannounced when work is in progress), as task related inspections (for example, prior to installing a ground rod the BVES inspector must be on site), and/or a combination the later methods.
- Results of in-process QC checks should be reviewed with the Regulatory Compliance Project Engineer and the Utility Engineer & Wildfire Mitigation Supervisor and corrective action directed if necessary.
- Closeout QC checks shall be designed to confirm the as-built drawings, inspect the quality of the workmanship, and ensure that the designated materials were installed. Additionally, the closeout QC checks will include an audit of the Work Order package.
- When work is reported complete, the Field Operations Supervisor shall direct closeout QC checks be conducted.
- Results of closeout QC checks should be reviewed with the Regulatory Compliance Project Engineer and the Utility Engineer & Wildfire Mitigation Supervisor and corrective action directed if necessary.
- The Regulatory Compliance Project Engineer shall perform a work package audit and validate the materials and work performed.

The Utility Engineer & Wildfire Mitigation Supervisor shall review the results of in process and closeout QC checks and the completed Work Order package and will direct re-work and/or

other corrective action if necessary. Once, the Utility Engineer & Wildfire Mitigation Supervisor is satisfied the work is of satisfactory quality, the Work Order may be closed out.

7.5. Substation Work. The Utility Engineer & Wildfire Mitigation Supervisor shall approve specific in process and closeout QC checks for substation work. The Utility Engineer & Wildfire Mitigation Supervisor shall utilize the following guidance:

- Prior to authorizing work, the Utility Engineer & Wildfire Mitigation Supervisor shall review and approve the design, construction drawings, and technical specifications and then issue a Work Order to direct the specified work.
- The Utility Engineer & Wildfire Mitigation Supervisor shall approve a specific testing and commissioning program that must be satisfactorily completed prior to accepting major substation work.
- The Utility Manager shall establish a contract with a qualified contractor per the Company's procurement policy.
- Equipment and material shall be ordered per Section 7.1 above as applicable once the Work Order is opened.
- The Utility Engineer & Wildfire Mitigation Supervisor in coordination with the Field Operations Supervisor shall determine the specific in process and closeout QC checks to be conducted and select the staff that will conduct the QC checks. Generally, QC checks shall be performed by the Substation Technician or a BVES Journeyman Lineman Foreman.
- Staff that will be involved in the QC checks shall review the Work Order.
- Once the Work Order is authorized, equipment and material are received, contract in place for the contracted work, and the work schedule supports the work, the Field Operations Supervisor in coordination with the Project Coordinator will direct the contractor to conduct the work.
- In-process QC checks may be designated to be conducted periodically (for example, daily when work is in progress), randomly (for example, unannounced when work is in progress), as task related inspections (for example, prior to making up switch connections, the BVES inspector must be on site), and/or a combination the later methods.
- Results of in-process QC checks should be reviewed with the Regulatory Compliance Project Engineer and the Utility Engineer & Wildfire Mitigation Supervisor and corrective action directed if necessary.
- Closeout QC checks shall be designed to confirm the as-built drawings, inspect the quality of the workmanship, and ensure that the designated materials were installed. Additionally, the closeout QC checks will include an audit of the Work Order package.
- When work is reported complete, the Field Operations Supervisor shall direct closeout QC checks be conducted.
- Results of closeout QC checks should be reviewed with the Regulatory Compliance Project Engineer and the Utility Engineer & Wildfire Mitigation Supervisor and corrective action directed if necessary.

- When conditions are met, the Field Operations Supervisor shall direct performance of the testing and commissioning program. The testing and commissioning program should generally be conducted by a third party independent of the contractor performing the work and/or the Substation Technician. The Substation Technician shall oversee any third party that performs the testing and commissioning program.
- The Utility Engineer & Wildfire Mitigation Supervisor shall review the results of the testing and commissioning program prior to accepting the work as being complete.
- Upon receipt of an invoice for the work, the Project Coordinator shall perform a work package audit and validate the materials and work performed. Project Coordinator also performs a validation of billing units, and ensures the Substation Technician's verification of work completion and approval for billing. Invoices will not be approved unless the work meets required standards per the scope of work.

Utility Engineer & Wildfire Mitigation Supervisor shall review the results of closeout QC checks and testing and commissioning program, and will direct re-work and/or other corrective action if necessary. Once, the Utility Engineer & Wildfire Mitigation Supervisor is satisfied the work is of satisfactory quality, the Work Order may be closed out.

7.6. Asset Inspections. The Wildfire Mitigation & Reliability Engineer in coordination with the Field Operations Supervisor and the Utility Engineer and Wildfire Mitigation Supervisor shall administer the asset inspection QA and QC program. QA audits and QC field checks of asset inspections will be performed in accordance with Table 7-1, Asset Inspection QA/QC, below.

Table 7-1, Asset Inspection QA/QC

Asset Inspection	Annual QA Audit Responsibility	QA Audit Sample Size	QA Audit Pass Rate	QC Field Check Responsibility	QC Field Check Sample Size	QC Field Check Pass Rate
Detailed Inspections	Wildfire Mitigation & Reliability Engineer	100% of results	90%	Field Operations*	5% of inspected facilities	90%
Patrol Inspections	Wildfire Mitigation & Reliability Engineer	100% of results	90%	Field Operations*	5% of inspected facilities	90%
UAV Thermography Inspections	Wildfire Mitigation & Reliability Engineer	100% of results	90%	Field Operations	100% of reported discrepancies	90%
UAV HD Photography/ Videography Inspections	Wildfire Mitigation & Reliability Engineer	100% of results	90%	Field Operations	100% of reported discrepancies	90%
3rd Party Ground Patrol Inspections	Wildfire Mitigation & Reliability Engineer	100% of results	90%	Field Operations	100% of reported discrepancies	90%
Intrusive Pole Inspections	Utility Engineer and Wildfire Mitigation Supervisor	100% of results	90%	Engineering & Planning	100% of reported discrepancies	90%

Substation Inspection	Utility Engineer and Wildfire Mitigation Supervisor	100% of results	90%	Engineering & Planning	100% of reported discrepancies	90%

*QC Field Check must be performed by someone other than the person performing the Detailed and Patrol Inspection.

An QA annual audit of each asset inspection includes a 100% review of the asset inspection results and how the inspection was conducted. All asset inspection discrepancies are field checked. Additionally, a completeness check is performed to ensure the inspection included all of the facilities designated to be inspected. An audit pass rate of 90% is designated. Scores below 90% indicate an inspection process problem. If the score is below 90%, the root causes are investigated by the Wildfire Mitigation & Reliability Engineer and Utility Engineer and Wildfire Mitigation Supervisor and they are addressed with the persons performing the inspection. The failing inspections are paused until the issues are resolved. Also, depending on the severity of the issues, the all or part of the inspection may be directed to be conducted again by the Wildfire Mitigation & Reliability Engineer. All audit discrepancies are reviewed with the applicable inspector(s).

QA/QC of distribution Detailed Inspections and Patrol Inspections conducted by Bear Valley's Field Inspector will include a supervisor's review and assessment of 100% of the findings identified during inspection. This will be conducted within 1 month of the inspection. The results of the review and assessment will be documented. In addition, each year 5% of the inspected facilities will be checked by a qualified inspector other than the person performing the original inspection as a QC check on these inspections. A pass rate of 90% is designated for these checks. If the checks result in a score below 90%, the root causes are investigated by the Wildfire Mitigation & Reliability Engineer and Field Operations Supervisor and they are addressed with the Field Inspector. The failing inspections are paused until the issues are resolved. Also, depending on the severity of the issues, all or part of the inspection may be directed to be conducted again by the Wildfire Mitigation & Reliability Engineer.

The Wildfire Mitigation & Reliability Engineer will track pass/fail audit results, which will be communicated back to inspectors. Trends will be monitored and appropriate training will be delivered either individually or through annual refresher trainings administered to all qualified inspectors.

For UAV Thermography Inspections, UAV HD Photography/ Videography Inspections, and 3rd Party Ground Patrol Inspections the Wildfire Mitigation & Reliability Engineer conducts a combination of quality assurance and quality checks on 100% of findings created by these inspections. Once the data is delivered by the contractor, a quality assurance desktop review is conducted on all of the findings. Once the QA audit portion is completed the Field Inspector is sent into the field to conduct a visual QC field check to ensure that all findings are investigated and remediated. All of the findings sent to Bear Valley are QA audited and QC field checked by Bear Valley's engineering/operations personnel. Any QA/QC discrepancies are sent to the contractor for further resolution and training.

The Utility Engineer & Wildfire Mitigation Supervisor conducts a QA audit on 100% of Substation Inspection findings. Once a substation is inspected, the reports are submitted to the Utility Engineer & Wildfire Mitigation Supervisor and reviewed to ensure that the inspector followed the appropriate substation inspection procedures. Following the audit, Engineering & Planning performs a QC field check on 100% of the inspection findings to ensure that all findings are investigated and remediated. Any QA/QC discrepancies are reviewed with the Substation Technician for further resolution and training.

The Utility Engineer & Wildfire Mitigation Supervisor conducts a QA audit on 100% of Intrusive Inspection results. Following the audit, Engineering & Planning performs a QC field check on 100% of the inspection findings to ensure that all findings are investigated and remediated. Any QA/QC discrepancies are sent to the contractor for further resolution and training.

The Wildfire Mitigation & Reliability Engineer conducts cross checks across all of the different asset inspection programs as an additional QA/QC. The Wildfire Mitigation and Reliability Engineer reviews the findings from each of the asset inspections conducted and will question why some inspections identify certain findings and others did not. For example, if the UAV Photography/Videography inspection identifies discrepancies that were not identified in the 3rd Party Ground Patrol inspection, the Wildfire Mitigation and Reliability Engineer will pursue the reasons for the gap. Each inspection has unique capabilities but, in some instances, both inspections should pick up the discrepancy so this may be used as a QA/QC. Any issues are brought to the attention of the inspector for further resolution and training. These cross checks are to be documented by the Wildfire Mitigation and Reliability Engineer.

7.7. Wildfire Mitigation Plan Initiative QA/QC. The Utility Engineer & Wildfire Mitigation Manager will determine which WMP initiatives require specific QA/QC procedures that are not covered by this instruction or other BVES instructions. The specific QA/QC instructions will be articulated on the BVES QA/QC WMP Initiative Instruction Form provided in Appendix B. The Utility Engineer & Wildfire Mitigation Supervisor will in coordination with the WMP initiative owners will complete the BVES QA/QC WMP Initiative Instruction Form for designate WMP initiatives. The BVES QA/QC WMP Initiative Instruction Form will be retained by the Utility Engineer & Wildfire Mitigation Supervisor and the WMP initiative owner.

7.8. Power Plant Work. The Field Operations Supervisor in coordination with the Senior Power Plant Operator shall approve specific in process and closeout QC checks for power plant work. The Field Operations Supervisor shall utilize the following guidance:

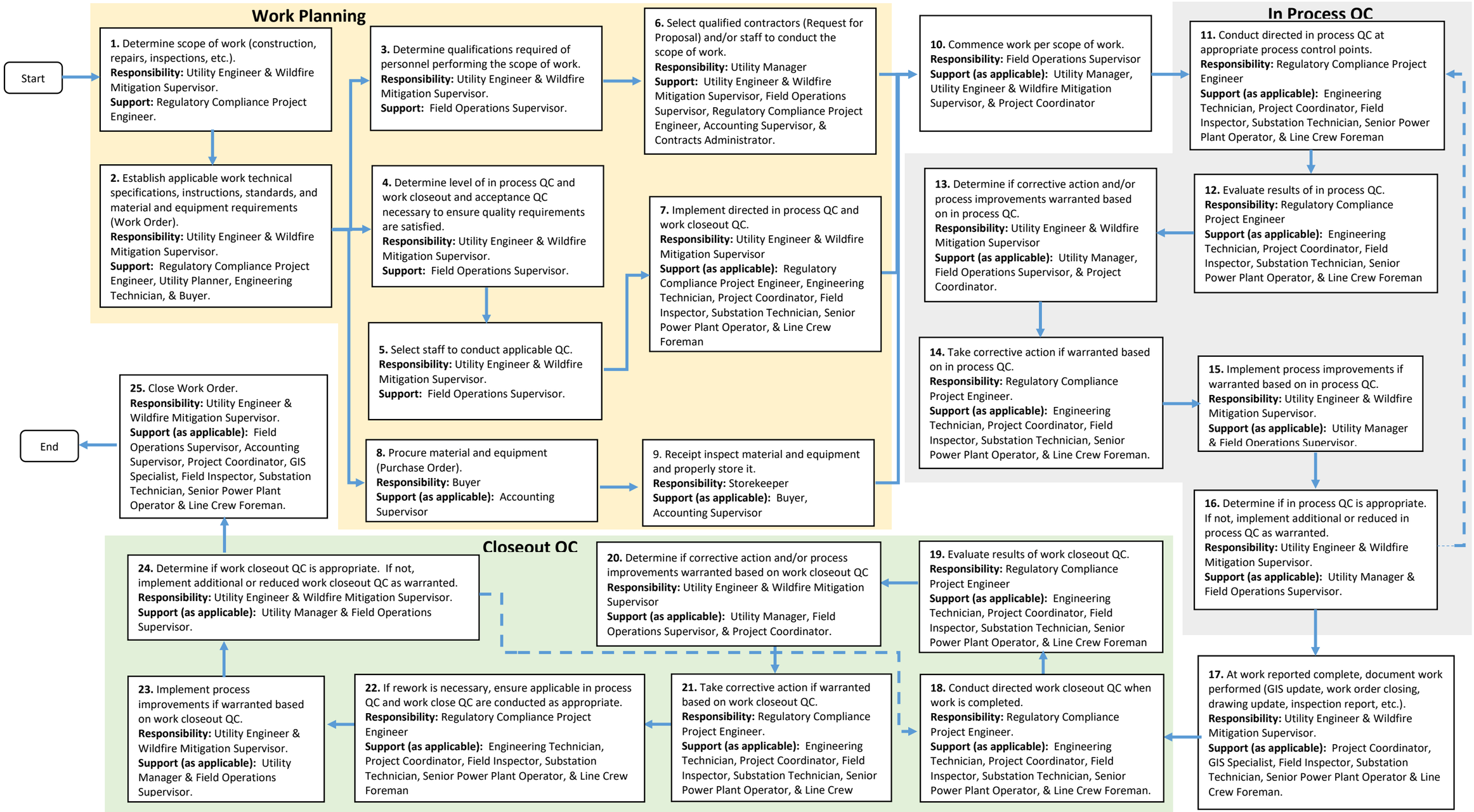
- Prior to authorizing work, the Field Operations Supervisor in coordination with the Senior Power Plant Operator shall review and approve the design, construction drawings, and technical specifications and then issue a Work Order with Engineering and Planning support to direct the specified work.
- The Field Operations Supervisor in coordination with the Senior Power Plant Operator shall approve a specific testing and commissioning program that must be satisfactorily completed prior to accepting major power plant work.

- The Utility Manager shall establish a contract with a qualified contractor per the Company's procurement policy.
- Equipment and material shall be ordered per Section 7.1 above as applicable once the Work Order is opened.
- The Field Operations Supervisor in coordination with the Senior Power Plant Operator shall determine the specific in process and closeout QC checks to be conducted and select the staff that will conduct the QC checks. Generally, QC checks shall be performed by the Senior Power Plant Operator or Power Plant Operator.
- Staff that will be involved in the QC checks shall review the Work Order.
- Once the Work Order is authorized, equipment and material are received, contract in place for the contracted work, and the work schedule supports the work, the Field Operations Supervisor in coordination with the Project Coordinator will direct the contractor to conduct the work.
- In-process QC checks may be designated to be conducted periodically (for example, daily when work is in progress), randomly (for example, unannounced when work is in progress), as task related inspections (for example, prior to reassembly of an engine cylinder, the BVES inspector must be on site), and/or a combination the later methods.
- Results of in-process QC checks should be reviewed with the Field Operations Supervisor and the Senior Power Plant Operator and corrective action directed if necessary.
- Closeout QC checks shall be designed to confirm the as-built drawings, inspect the quality of the workmanship, and ensure that the designated materials were installed. Additionally, the closeout QC checks will include an audit of the Work Order package.
- When work is reported complete, the Field Operations Supervisor shall direct closeout QC checks be conducted.
- Results of closeout QC checks should be reviewed with the Field Operations Supervisor and the Senior Power Plant Operator and corrective action directed if necessary.
- When conditions are met, the Field Operations Supervisor shall direct performance of the testing and commissioning program. The testing and commissioning program should generally be conducted by a third party independent of the contractor performing the work and/or the Senior Power Plant Operator. The Senior Power Plant Operator shall oversee any third party that performs the testing and commissioning program.
- The Field Operations Supervisor and the Senior Power Plant Operator shall review the results of the testing and commissioning program prior to accepting the work as being complete.
- Upon receipt of an invoice for the work, the Project Coordinator shall perform a work package audit and validate the materials and work performed. Project Coordinator also performs a validation of billing units, and ensures the Senior Power Plant Operator's verification of work completion and approval for billing. Invoices will not be approved unless the work meets required standards per the scope of work.

The Field Operations Supervisor and Senior Power Plant Operator shall review the results of closeout QC checks and testing and commissioning program, and will direct re-work and/or

other corrective action if necessary. Once, the Utility Engineer & Wildfire Mitigation Supervisor is satisfied the work is of satisfactory quality, the Work Order may be closed out.

Appendix A: BVES QA Process Flow Chart



Appendix B: BVES QA/QC WMP Initiative Instruction Form

[Enter initiative title and tracking ID]	**Revision:** **Date:**

PURPOSE AND SCOPE

Responsibilities and Authorities

References

Record Keeping

QA Procedures

QC Procedures