



August 20, 2025

Dear Stakeholders,

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Annual Report on Compliance regarding Bear Valley Electric Service, Inc.'s execution of its 2023 Wildfire Mitigation Plan.

This Annual Report on Compliance is published as of the date of this letter. Bear Valley Electric Service, Inc. may, if it wishes to do so, file a public response to this Annual Report on Compliance within 14 calendar days of the date of publication. Comments must be submitted to the Energy Safety's E-Filing system in the 2023 Annual Report on Compliance docket.¹

Sincerely,

Patrick Doherty
Program Manager | Compliance Assurance Division
Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

¹ Submit responses to the [2023-ARC docket via the Office of Energy Infrastructure Safety's E-Filing system](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-ARC) here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-ARC>.



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

**2023 ANNUAL REPORT ON
COMPLIANCE**

BEAR VALLEY ELECTRIC SERVICE, INC.

August 2025

TABLE OF CONTENTS

Executive Summary	1
1. Introduction	3
1.1 Compliance Process.....	3
2. BVES 2023 Wildfire Mitigation Plan	4
3. BVES Annual Report on Compliance	6
3.1 EC ARC Information on Initiative Completion.....	6
3.2 EC ARC Information on Initiative Funding.....	8
4. Independent Evaluator ARC for BVES.....	9
5. Energy Safety Assessment of WMP Initiative Completion.....	12
5.1 BVES 2023 WMP Initiative Activities Assessed by Energy Safety	12
5.2 Energy Safety Analysis of Substantial Vegetation Management Audit.....	13
5.3 BVES WMP Objective and Initiative Activity Attainment in 2023.....	13
5.3.1 Budget Impact of Not Attained Initiatives	16
5.3.2 Risk Impact of Not Attained Initiatives.....	16
6. Ignition Risk, Outcome Metrics, and Inspections	18
6.1 Ignition Risk Metrics	19
6.1.1 Ignition Data Analysis.....	19
6.1.2 Wire Down Events Data Analysis.....	19
6.1.3 Outage Event Data Analysis.....	23
6.1.4 Public Safety Power Shutoff Event Data Analysis.....	25
6.2 Outcome Metrics	26
6.3 Energy Safety Field Inspection Analysis.....	26
6.4 Energy Safety Analysis of Reporting Accuracy and Completeness.....	27
7. Conclusion.....	28
8. References	29
9. Appendices.....	33

Appendix A: BVES Information on WMP Initiative Activity Attainment.....	33
Appendix B: Substantial Vegetation Management Audit of BVES.....	61
Appendix C: Additional Ignition Risk Analyses.....	64

LIST OF TABLES

Table 1. Overview of EC ARC Reported 2023 WMP Budget and Expenditures.....	8
Table 2. BVES Non-attainment of WMP Initiative Activities	14
Table 3. Full References for Citations.....	29
Table 4. BVES WMP initiative Activity Attainment Information.....	33
Table 5. Summary of Energy Safety Findings from BVES 2023 SVM Audit and Audit Report of WMP Vegetation Management Initiatives	61

LIST OF FIGURES

Figure 1. BVES Wire Down Event Counts (2016-2023) by HFTD Tier	20
Figure 2. BVES Wire Down Events Normalized by OCM (2016-2023) by HFTD Tier.....	21
Figure 3: BVES Wire Down Events Delineated by Risk Driver.....	22
Figure 4. BVES Outage Events (2016-2023) by HFTD Tier	23
Figure 5. BVES Outage Events Normalized by OCM (2016-2023) by HFTD Tier	24
Figure 6. BVES Outage Events (2016-2023) by Risk Driver	25
Figure 7. BVES Overhead Circuit Miles (2016-2023) by HFTD Tier	65
Figure 8. BVES High Wind Warning Overhead Circuit Mile Days (2016-2023) by HFTD Tier	66
Figure 9. BVES Red Flag Warning Overhead Circuit Mile Days (2016-2023) by HFTD Tier	67
Figure 10. BVES Wire Down Events Normalized by HWWOCMD (2016-2023) by HFTD Tier	68
Figure 11. BVES Wire Down Events Normalized by RFWOCMD (2016-2023) by HFTD Tier	69
Figure 12. BVES Outage Events Normalized by HWWOCMD (2016-2023) by HFTD Tier	70
Figure 13. BVES Outage Events Normalized by RFWOCMD (2016-2023) by HFTD Tier.....	71

Executive Summary

The Office of Energy Infrastructure Safety (Energy Safety) is tasked with assessing and either approving or denying Wildfire Mitigation Plans (WMPs) annually filed by electrical corporations pursuant to Public Utilities Code section 8386 *et seq.* The law also directs Energy Safety to ensure that the electrical corporations have complied with their WMPs.

Pursuant to Government Code section 15475.1, Energy Safety's primary objective is to ensure that electrical corporations reduce wildfire risk and comply with energy infrastructure safety measures. Energy Safety's annual compliance assessment of BVES's execution of its 2023 WMP is a comprehensive look at whether BVES's completion of its 2023 WMP initiatives reduced the risk of its equipment igniting a catastrophic wildfire.

Energy Safety's assessment found that Bear Valley Electric Service, Inc. (BVES) completed 55 of 65 (85%) of its 2023 targets for initiative activities and objectives in its 2023-2025 Base WMP (2023 WMP). Of the 55 completed initiatives, eight were from the largest 10 initiatives by planned expenditure. Overall, BVES failed to meet targets for 10 of its 2023 WMP initiative activities and objectives. Given the 10 missed targets, BVES was not completely successful in removing the originally planned risk from its system.

For the 2023 compliance year, BVES spent over its planned amount by approximately \$6.3 million or 28% over the \$22.8 million overall budget. BVES indicated actual spending deviated from its planned spending due to a variety of factors, such as:

- For traditional overhead hardening, the project exceeded overhead hardening work originally planned.
- For the Covered Conductor replacement project, the related projects exceeded their annual activity target due to favorable conditions permitting additional project work.
- For the Radford Line replacement project, the project work was postponed to 2024 due to insufficient permits.

With respect to BVES's performance on ignition risk and outcome metrics in 2023, BVES did not record any ignitions, Public Safety Power Shutoff events, or other wildfire-related outcome events in their territory between 2016 and 2023. Comparatively, wire down events generally increased from 2016 to 2022, but decreased in 2023. Unplanned outage events exhibit a pattern similar to wire down events.

Energy Safety conducted its compliance review process through a variety of means including audits, field inspections, and analysis of data submitted by BVES to Energy Safety. Energy Safety also assessed several performance metrics, including metrics that reveal the risk on BVES's system. Energy Safety additionally reviewed BVES's self-assessment in its Electrical Corporation Annual Report on Compliance (EC ARC) and the findings of its independent evaluator.

Energy Safety has identified areas for improvement in the inadequate reporting of its WMP implementation by BVES and expects BVES to improve the level of detail, accuracy, and quality of its documentation going forward.

Energy Safety acknowledges that in 2023, BVES undertook efforts to reduce its wildfire risk, and in many instances achieved its WMP initiative activity targets.

On balance, BVES was successful in executing its plan for wildfire risk mitigation in that few initiatives were left incomplete. The incomplete Redford line initiatives nonetheless impeded BVES's ability to mitigate its risk. In addition, there are still areas to improve upon and opportunities to continue learning and increase detail in the EC ARC.

1. Introduction

This Annual Report on Compliance (ARC) presents the Office of Energy Infrastructure Safety's (Energy Safety's) statutorily mandated assessment of Bear Valley Electric Service, Inc.'s (BVES's) compliance with its 2023 targets for initiatives and objectives in its 2023-2025 Base Wildfire Mitigation Plan (2023 WMP).¹ While the 2023-2025 Base WMP considers activities over a three- and ten-year horizon, this report only addresses targets established for initiatives and objectives for the 2023 compliance year. Therefore, this report uses the term "2023 WMP" to refer to portions of the 2023-2025 Base WMP addressed by this report.

In the sections that follow, Energy Safety describes the statutory and regulatory basis for its reporting, the information supplied by the electrical corporation, and the independent evaluation conducted by a third-party independent evaluator (IE) that examined BVES's execution of its 2023 WMP and how its infrastructure performed in 2023 relative to wildfire risk. Finally, Energy Safety provides its conclusions, observations, and recommendations for further actions by BVES.

1.1 Compliance Process

The statutory objective of electrical corporation wildfire mitigation planning efforts is to ensure that electrical corporations are constructing, maintaining, and operating their infrastructure in a manner that will minimize the risk of catastrophic wildfire.²

Energy Safety's 2024 Compliance Process, as approved by the California Public Utilities Commission, establishes the parameters for this Annual Report on Compliance. Consistent with the 2024 Compliance Process, this report considers the totality of all compliance assessments completed with respect to BVES's 2023 WMP. This includes all inspection, audit, investigation, and data analysis work performed by Energy Safety, as well as separate electrical corporation and independent third-party evaluations of compliance.³

Energy Safety assessed whether the electrical corporation met the 2023 WMP targets for initiatives and objectives, looking specifically at whether the electrical corporation funded and performed the work stated for each initiative.⁴

¹ 2023 WMP.

² Pub. Util. Code § 8386(a).

³ Compliance Process, page 8.

⁴ Compliance Process, page 8.

2. BVES 2023 Wildfire Mitigation Plan

BVES submitted a comprehensive WMP in 2023 covering a three-year term from 2023 through the end of 2025.⁵

Energy Safety approved BVES's 2023 WMP on November 6, 2023.⁶ BVES's 2023 WMP highlighted recent and ongoing efforts to mitigate wildfire risk related to electrical infrastructure and reduce the impacts on Public Safety Power Shutoff (PSPS) events.⁷ Mitigation efforts covered a wide range of programs, including:

- **Grid Design, Operations, and Maintenance:** BVES planned to continue system hardening with objectives such as installing covered wire on all sub-transmission lines (34.5 kV) and all bare (4 kV) distribution wire, as well as conducting an evaluation of distribution poles.⁸ The planned work included verifying that BVES' overhead infrastructure can endure expected fire and wind conditions within the service area and making necessary replacements or reinforcements for any noncompliant poles⁹
- **Vegetation Management:** BVES planned to continue utilizing various inspection methods such as several light detection and ranging (LiDAR) surveys, unmanned aerial vehicle (UAV) high definition (HD) photography, videography and thermography, and third-party inspections.¹⁰
- **Situational Awareness and Forecasting:** BVES planned to continue its efforts to improve its situational awareness and forecasting by installing 30 fault indicators as well as continuing to install grid monitoring systems on two circuits per year.¹¹
- **Emergency Preparedness:** BVES planned to continue utilizing its Emergency and Disaster Recovery Plan (EDRP), outlining its response to emergencies and disasters, and PSPS activations. This applies to PSPS events initiated by BVES itself or those initiated by Southern California Edison Company (SCE) that impacted BVES

⁵ 2023 WMP.

⁶ WMP Decision.

⁷ WMP Decision, page 1.

⁸ WMP, pages 126-129.

⁹ WMP, pages 130-132.

¹⁰ WMP, pages 147-150.

¹¹ WMP, page 235 and 237.

customers. Both the EDRP and PSPS protocols were planned to meet regulatory requirements including compliance with Public Utilities Code section 768.6(a).^{12, 13}

- Community Outreach and Engagement: BVES planned to actively educate the public and collaborate with community partners to enhance outreach, awareness, and communication year-round.¹⁴

The 2023 WMP also contains three- and ten-year objectives.¹⁵

Selected three-year objectives include:

- Replace all sub-transmission (34.5 kV) overhead bare conductors with covered conductors.
- Harden secondary evacuation routes in the highest risk areas.
- Continue an asset inspection routine of annual detailed inspections, patrol inspections, LiDAR surveys, UAV HD photography and thermography, third-party ground patrols, intrusive pole testing, and substation inspections.

Selected ten-year objectives include:

- Replace all high and medium risk distribution (4 kV) overhead bare wires.
- Automate remaining substations, switches, field devices, and fuse TripSavers to connect to Supervisory Control and Data Acquisition (SCADA) equipment.
- Assess emerging technologies aimed at early detection of asset degradation, wire down detection, and other ignition prevention and mitigation technologies.

Of particular importance are the following WMP objectives which have targets or goals for the 2023 compliance year:

- Complete the installation of 30 fault indicators.¹⁶
- Complete an online diagnostic pilot, utilizing continuous monitoring sensors to provide measured, reported, and documented insight on one of its circuits.¹⁷
- Develop and implement a fire potential index to calculate PPS risk in a quantitative manner.¹⁸

¹² WMP, page 257.

¹³ Public Util Code § 768.6(a)

¹⁴ WMP, page 374.

¹⁵ WMP, pages 98-99 and pages 109-115.

¹⁶ WMP, page 235.

¹⁷ WMP, page 4.

¹⁸ WMP, page 63.

Descriptions and a complete list of the objectives and initiatives contained in BVES's 2023 WMP are listed in Information in Appendix A.

3. BVES Annual Report on Compliance

Public Utilities Code section 8386.3(c)(1) directs electrical corporations to file a report addressing the electrical corporation's compliance with their WMP during a compliance year. This document is known as the Electrical Corporation Annual Report on Compliance (EC ARC).

Energy Safety's 2023 Compliance Guidelines outlined the requirements for an EC ARC. The EC ARC was required to detail the electrical corporation's self-assessment of its compliance with the 2023 WMP during the 2023 compliance period.¹⁹

BVES submitted its EC ARC to Energy Safety on April 2, 2024.²⁰ The following is a narrative summary of the EC ARC.

In general, BVES asserted that it had met the risk reduction goals outlined in its 2023 WMP.

3.1 EC ARC Information on Initiative Completion

In the EC ARC, BVES asserted that it met the risk reduction goals outlined in its 2023 WMP but provided limited information on the specific wildfire mitigation initiatives and achievements related to the 2023 period.²¹ In the EC ARC, BVES stated that it focused its risk reduction efforts on the following goals:²²

- **Situational Awareness and Forecasting:** In the EC ARC, BVES stated that it initiated a pilot program with a third-party involving the installation of cameras that monitor the line, pole, and associated assets. The system provided automated monitoring of the assets' physical condition and monitored ignitions. BVES also implemented Technosylva's Fire Potential Index (FPI) model that was developed specifically for BVES's service territory.
- **Grid Design and System Hardening:** In the EC ARC, BVES stated that it worked to mitigate ignitions, reduce consequences of wildfires, and minimize PSPS events.
- **Asset Management:** In the EC ARC, BVES highlighted the continuance of several advanced technology inspection techniques beyond those required by General Order (GO) 165 inspection compliance requirements. BVES also stated that it initiated a

¹⁹ Compliance Guidelines.

²⁰ EC ARC.

²¹ EC ARC, page 4.

²² EC ARC, pages 5-12.

formal asset management quality assurance and quality control (QA/QC) program aimed at grid hardening work and asset inspections.

- Vegetation Management and Inspections: In the EC ARC, BVES stated that it focused on executing its enhanced vegetation management program, removing hazard-threat trees, continuing to use advanced technology inspection techniques beyond those required by GO 165 inspection compliance requirements. BVES said that it improved its formal QA/QC program aimed at vegetation management work as well as vegetation management inspections.

In the EC ARC, BVES did not separately identify each of the WMP initiative targets it tracked in 2023. However, BVES did include a total of 64 initiatives in its EC ARC expenditure table in Attachment A of its report.²³ With the exception of the Radford Line replacement-related initiatives, BVES did not identify any instances of non-attainment for 2023 WMP initiatives. BVES did provide some context in its discussion of planned versus actual expenditure for some (but not all) initiatives.²⁴ For more information on Energy Safety's assessment of BVES's attainment of its 2023 WMP initiative targets, see Table 2 in Section 5.3.

In its EC ARC, BVES highlighted the following as key initiative accomplishments in 2023:²⁵

- Exceeded the annual target to harden 500 poles along the main evacuation routes to the Big Bear Lake area by installing fire-resistant wire mesh on 909 poles (180% of the target).²⁶
- Replaced 20.7 circuit miles of bare wire with covered conductor exceeding the annual target of 12.9 circuit miles (160% of the target).²⁷
- Connected 13 field switches and six capacitor banks to SCADA equipment as part of the system automation initiatives.²⁸
- Conducted detailed inspections on 850 poles and identified and remediated 15 poles that failed the inspection.²⁹

²³ EC ARC, pages 32-43.

²⁴ EC ARC, pages 32-43.

²⁵ EC ARC, pages 7-8.

²⁶ WMP, page 118.

²⁷ WMP, page 117.

²⁸ WMP, page 119.

²⁹ WMP, page 124.

3.2 EC ARC Information on Initiative Funding

In the EC ARC, BVES asserted that it spent above the planned amounts on its 2023 WMP initiatives by approximately \$5.3 million in aggregate.³⁰ This amount is broken out by capital and operational expenditures in Table 1, below.³¹

On operational expenditures, BVES asserted that it spent more than the planned amount from its 2023 WMP initiatives by \$1.1 million. For example, on a 2023 WMP initiative related to substation equipment testing, BVES spent more than the planned amount due to the actual cost being higher than forecasted.³² On capital expenditures, BVES asserted that it spent more than the planned amount for its 2023 WMP initiatives by \$4.3 million. This is primarily the result of two initiatives exceeding their planned targets: 1) an initiative related to substation automation exceeding the initiative target by 7.8 circuit miles, and 2) distribution pole replacements and reinforcement exceeding the initiative target by 109 poles.³³

Table 1. Overview of EC ARC Reported 2023 WMP Budget and Expenditures

	Planned (\$ millions)	Actual (\$ millions)	Over/(Under) (\$ millions)
Capital Expenditures	\$17.63	\$21.89	\$4.25
Operational Expenditures	\$5.24	\$6.32	\$1.08
Total	\$22.87	\$28.21	\$5.34 ³⁴

³⁰ EC ARC pages 32-43.

³¹ These values are as reported in the EC ARC and do not necessarily align with the Energy Safety findings described in Appendix A. For example, BVES reported expenditures in the EC ARC for initiatives that had no corresponding targets in the 2023 WMP, such as: Technosylva Contractor Program (RMA_1), Wildfire Mitigation Strategy Development (WMSD_1), and Asset Workforce Planning (GD_40).

³² EC ARC, pages 37-38.

³³ EC ARC, pages 7-8 and pages 32-33.

³⁴ This amount is self-reported by BVES in its EC ARC but differs from the amount decided upon by Energy Safety and reported in the Executive Summary, Conclusions, and Section 4. The difference in amounts stem from Energy Safety's assessment of solely quantitative initiatives, which results in a different number for total expenditures.

4. Independent Evaluator ARC for BVES

Energy Safety, in consultation with the Office of the State Fire Marshal, annually publishes a list of entities qualified to serve as IEs of WMP compliance.³⁵ Each electrical corporation is then required to hire an independent evaluator (IE) from the list to perform an independent WMP compliance evaluation.³⁶

The IE reviews and evaluates the electrical corporation's compliance with its approved WMP. As part of its evaluation, the IE must determine whether the electrical corporation failed to fund any activities included in its plan.

On July 1st of each year, the IE issues its Independent Evaluator Annual Report on Compliance (IE ARC) for a given electrical corporation.³⁷

The 2023 IE ARC for BVES was prepared by Bureau Veritas North America, Inc. The IE ARC included a review of the wildfire mitigation initiatives and activities implemented in 2023, and an accounting of whether BVES met its performance targets, underfunded any of the initiatives, and followed its QA/QC processes.

The IE determined that BVES met its 2023 WMP goals of reducing the risk of wildfires in the communities it serves.³⁸ The IE also evaluated BVES's funding of initiatives by analyzing public records issued by BVES and information requested by the IE. The analysis focused on initiatives that were underspent. The IE concluded that the Radford Line replacement project did not satisfy its risk reduction goal, due to the delay in completing that project.³⁹ The remaining 11 activities where expenditure was less than forecasted satisfied risk reduction goals.^{40, 41} Finally, the IE reviewed BVES's QA/QC processes and validated all QA/QC programs.⁴²

The IE utilized a variety of techniques to analyze BVES's progress toward meeting its 2023 WMP commitments, such as inspecting a sample of BVES's field-verifiable WMP initiatives and

³⁵ Pub. Util. Code § 8386.3(c)(2)(A).

³⁶ Pub. Util. Code § 8386.3(c)(2)(B)(i).

³⁷ Pub. Util. Code § 8386.3(c)(2)(B)(i).

³⁸ IE ARC, page 86.

³⁹ IE ARC, pages 70-71.

⁴⁰ IE ARC, pages 71-74.

⁴¹ The initiatives where spending was less than budget but nonetheless satisfied risk reduction goals are: Evacuation Route Hardening Project (GD_6), Switch and Field Device Automation (GD_13), Capacitor Bank Upgrade Project (GD_14), Server Room (GD_16), UAV HD Photography and Videography (GD_28), 3rd Party Ground Patrol (GD_30), UAV HD Photography and Videography (VM_3), 3rd Party Ground Patrol (VM_5), Substation defensible space (VM_11), Install Fault Indicators (SAF_2), and Online Diagnostic System (SAF_3).

⁴² IE ARC, pages 78-85.

performing desk audits of non-field verifiable initiatives. The IE segregated 20 large volume (≥ 100 units) quantifiable initiatives from the remaining smaller unit (< 100 units) initiatives.⁴³ Five of the 20 large volume initiatives were field verifiable, whereas the remaining 15 were non-field verifiable. The IE analyzed the 15 non-field verifiable initiatives by inspecting data samples.⁴⁴ The remaining 53 WMP initiatives were divided between 12 smaller unit initiatives with quantifiable goals and 41 initiatives with qualitative goals,^{45, 46} for a combined total of 73 WMP activities assessed by the IE.⁴⁷

The IE confirmed completion of required work for all five large volume, field verifiable initiatives, all 15 large volume, non-field verifiable initiatives, and all 12 smaller unit quantifiable initiatives. Of the remaining 41 initiatives with qualitative goals, the IE verified that 31 were validated, in progress, or ongoing. The IE determined that BVES achieved its large volume, field verifiable goals and target objectives described in the 2023 WMP.

However, the IE ARC did not determine if the qualitative goals met the status of attainment, but indicated initiatives to be “activity validated,” activity in progress,” “activity delayed,” “activity ongoing,” or “N/A.”. The IE defined their qualitative findings as:⁴⁸

- Activity Validated – Qualitative work on the initiative began and ended in 2023,
- Activity In Progress – Qualitative work on the initiative began in 2023 and continues into 2024,
- Activity Ongoing – Qualitative work on the initiative is incorporated into operations to be repeated annually, and
- Activity Delayed – Qualitative work on the initiative did not begin in 2023 and is expected to begin in the future.

More detailed accounts of the IE ARC findings are presented in Table located in Appendix A.⁴⁹

The IE concluded that BVES had met their 2023 WMP goals of reducing the risk of wildfires in the communities it serves.⁵⁰

As a result of the evaluation conducted, the IE provided observations in certain areas:

⁴³ IE ARC, pages 17-25.

⁴⁴ IE ARC, pages 26-38.

⁴⁵ IE ARC, pages 39-47.

⁴⁶ IE ARC, pages 48-68.

⁴⁷ Energy Safety’s assessment of 65 initiatives encompassed 52 quantitative initiative activities from BVES’s 2023 WMP and 13 initiative activities from Energy Safety’s Substantial Vegetation Management Audit Report. The extra eight initiatives evaluated by the IE were not assessed by Energy Safety due to the lack of quantitative goals for the eight initiatives.

⁴⁸ IE ARC, page 48.

⁴⁹ With respect to the 42 initiatives with qualitative goals, the IE found “Activity Validated” for 15 of them, “Activity in Progress” for 13 of them, “Activity Delayed” for three of them, “Activity Ongoing” for three of them, and “N/A” for eight of them. See IE ARC, pages 48-68.

⁵⁰ IE ARC, page 86.

- The IE visited 23 sample field locations for the tree attachment removal project.
 - It was discovered that one location had a terminated secondary conductor tree attachment on a weather head connected to a customer-owned pole.
 - Approximately 4.3% of the sample locations were found to not have been completed during the IE's field inspection. The IE could not confirm whether BVES exceeded its commitment by an additional 14 tree attachment removals, as claimed by BVES.⁵¹
- The following initiatives with qualitative goals were found to be "in progress" rather than fully validated or ongoing in 2023, but the IE did not explicitly classify these as being non-compliant with the commitments established by the 2023 WMP:
 - Bear Valley Solar Energy Project (8.1.2.7)
 - Energy Storage Project (8.1.2.7)
 - Server Room (8.1.2.8)⁵²
 - Other Grid Topology Improvements to Mitigate or Reduce PSPS Events (8.1.2.11)
 - Bear Valley Power Plant (BVPP) Phase 4 Upgrade Project (8.1.2.12)
 - Equipment Maintenance and Repair (8.1.4)
 - Asset Open Work Orders (8.1.7)
 - Wildfire Mitigation Strategy Development (8.3.3.4)
 - Weather Forecasting (8.3.5)
 - Technosylva Contractor Program (8.3.5.1)
 - Fire Potential Index (8.3.6)
 - Emergency Preparedness Plan (8.4.2)
 - Collaboration on Local Wildfire Mitigation Planning (8.5.4)

The IE identified the three Radford line initiatives along with two substation projects as not completed along with a few initiatives that exceeded their targets.

The IE evaluated financial data for 73 initiatives, including both the quantitative and qualitative initiatives.⁵³ In general, the IE ARC found that 13 of BVES's 73 WMP activities for 2023 were funded below the planned amount and two of the 13 activities funded below the planned amount did not satisfy the risk reduction goal.⁵⁴

⁵¹ IE ARC, page 23.

⁵² Server room initiative activity expands, upgrades, and improves security and reliability of the current computer server room capabilities.

⁵³ IE ARC, page 70.

⁵⁴ IE ARC, pages 70-77.

5. Energy Safety Assessment of WMP Initiative Completion

Energy Safety's assessment of BVES's performance in 2023 indicates that BVES attained 55 of its 65 targets (85%) for its 2023 WMP initiative activities and objectives and did not attain 10 of 65 targets (15%). The subsections below describe Energy Safety's assessment of BVES's execution of its 2023 WMP.

5.1 BVES 2023 WMP Initiative Activities Assessed by Energy Safety

Energy Safety assessed 65 wildfire mitigation initiatives from the 2023 WMP. The initiatives that were assessed were grouped into five main categories:

1. Grid Design, Operations, and Maintenance with 33 initiatives assessed and a budget of approximately \$18.9 million for the assessed initiatives.
2. Vegetation Management and Inspection with 18 initiatives assessed and a budget of approximately \$3.1 million for the assessed initiatives. Of the 18 initiatives assessed, 13 were assessed in the Substantial Vegetation Management (SVM) Audit Report and the remaining five are assessed in this ARC.
3. Situational Awareness and Forecasting with five initiatives assessed and a budget of \$535,000 for the assessed initiatives.
4. Emergency Preparedness with five initiatives assessed and a budget of \$39,000 for the assessed initiatives.
5. Community Outreach and Engagement with four initiatives assessed and a budget of \$158,000 for the assessed initiatives.

A complete list of initiatives appears in Appendix A, Table .

The initiative assessment process included comparing the actual initiative completion figures reported by BVES in the Quarterly Data Report (QDR), the EC ARC, and as reported by the IE in the IE ARC.⁵⁵ In some cases, Energy Safety issued data requests to answer specific questions. If data request information is used in the assessment, a citation for the instance is provided. Finally, Energy Safety's SWM Audit and SVM Audit Report also contributed to Energy Safety's

⁵⁵ 2023 Q4 QDR; EC ARC; IE ARC; and DR-285 Response.

ARC assessment.⁵⁶ The information from each of these sources is summarized along with the final assessment of compliance for each initiative in the table in Appendix A.

5.2 Energy Safety Analysis of Substantial Vegetation Management Audit

Public Utilities Code section 8386.3(c)(5) requires Energy Safety to perform an audit of the work performed by, or on behalf of, an EC with respect to the vegetation management requirements in its WMP.⁵⁷ Energy Safety refers to this audit as the SVM Audit. Pursuant to section 8386.3(c)(5), Energy Safety conducted an audit of BVES's work with respect to its vegetation management requirements for the 2023 compliance year.

On March 3, 2025, Energy Safety issued its SVM Audit for BVES.⁵⁸ In the SVM Audit, Energy Safety reviewed 13 vegetation management initiatives detailed in BVES's 2023 WMP and found that BVES did not perform all the work specified for three of 13 vegetation management initiatives. Energy Safety required BVES to provide a Corrective Action Plan response within 30 days from the issuance of the SVM Audit.⁵⁹

On April 2, 2025, BVES submitted its Corrective Action Plan to Energy Safety.⁶⁰ Subsequently, Energy Safety issued a SVM Audit Report on June 17, 2025, which found that based on the information provided in the Corrective Action Plan, BVES substantially complied with all but two of its vegetation management initiatives.⁶¹ Overall, the SVM Audit Report found that BVES substantially complied with a substantial portion of the vegetation management requirements in its 2023 WMP.⁶²

The specific findings from Energy Safety's SVM Audit Report are detailed in Appendix B.

5.3 BVES WMP Objective and Initiative Activity Attainment in 2023

Energy Safety assessed 65 wildfire mitigation initiative activities from the 2023 WMP and found that 10 initiative activities were not completed (15%). Of the 10 largest initiatives by planned expenditure amount, two were not met. Since the EC ARC did not go into detail

⁵⁶ SVM Audit Report.

⁵⁷ Pub. Util. Code § 8386.3(c)(5).

⁵⁸ SVM Audit.

⁵⁹ SVM Audit.

⁶⁰ SVM Audit Corrective Action Plan.

⁶¹ SVM Audit Report, page 16.

⁶² SVM Audit Report, page 16.

about individual unattained initiatives, these Energy Safety findings are not as favorable as those of the EC ARC. However, the Energy Safety findings are consistent with the IE ARC.

The 10 2023 WMP initiative activities not attained are: the Radford Line replacement project (with three separate targets not attained), BVPP Phase 4 Upgrade Project, partial safety and technical upgrades to Maltby Substation, safety and technical upgrades to Lake Substation, partial safety and technical upgrades to Village Substation, asset management and inspection enterprise systems, pole clearing, and vegetation management open work orders. The targets and actual attainment for these initiatives are shown below in Table 2. In the EC ARC, BVES only provided an explanation of why the Radford line-related initiatives were not completed. As there is no explanation for the remainder of the missed initiatives, BVES needs to make improvements in this area for future EC ARC submissions.

Table 2. BVES Non-attainment of WMP Initiative Activities⁶³

2023 WMP Initiative Name and Tracking IDs	2023 WMP Initiative Activity Target	Details of Non-attainment and Rationale
Radford Line-related Covered Conductor Installation 8.1.2.1 GD_2	Target: 2.7 Circuit miles.	No miles completed. Could not attain permit to begin work. ⁶⁴
Radford Line-related Undergrounding of Electric Lines and Equipment 8.1.2.2 GD_3	Target: 100% of Budget.	Information missing. Could not attain permit to begin work. ⁶⁵
Radford Line-related Distribution Pole Replacements and Reinforcements 8.1.2.3 GD_5	Target: 70 Poles replaced.	No poles replaced. Could not attain permit to begin work. ⁶⁶

⁶³ 2023 Q4 QDR.

⁶⁴ EC ARC, page 8.

⁶⁵ EC ARC, page 8.

⁶⁶ EC ARC, page 8.

2023 WMP Initiative Name and Tracking IDs	2023 WMP Initiative Activity Target	Details of Non-attainment and Rationale
BVPP Phase 4 Upgrade Project GD_21	Target: 32% of project milestones for natural [gas] engine upgrades.	Project not started. No information in EC ARC on why. ⁶⁷
Partial Safety and Technical Upgrades to Maltby Substation 8.1.2.12 GD_22	Target: 32% of project milestones for Maltby Substation.	Project not started. No information in EC ARC on why. ⁶⁸
Safety and Technical Upgrades to Lake Substation 8.1.2.12 GD_23	Target: 32% of project milestones for Lake Substation.	Project not started. No information in EC ARC on why. ⁶⁹
Partial Safety and Technical Upgrades to Village Substation 8.1.2.12 GD_24	Target: 32% of project milestones for Village Substation.	Project not started. No information in EC ARC on why. ⁷⁰
Asset Management and Inspection Enterprise System(s) 8.1.5 GD_34	Target: 100% of maintenance of asset management system. Activities include migration to cloud based software, additional inventory trackers, continued updates, and adding PSPS thresholds.	Project not started. No information in EC ARC on why. ⁷¹

⁶⁷ EC ARC, page 8.

⁶⁸ EC ARC.

⁶⁹ EC ARC.

⁷⁰ EC ARC.

⁷¹ EC ARC.

2023 WMP Initiative Name and Tracking IDs	2023 WMP Initiative Activity Target	Details of Non-attainment and Rationale
Pole Clearing 8.2.3.1 VM_7	Target: Plan and execute vegetation removal around poles per Public Resources Code section 4292.	BVES did not perform any pole brushing in 2023. BVES plans to improve its pole clearing program in 2025.
Vegetation Management Open Work Orders 8.2.6 VM_17	Manage open work orders resulting from inspections that prescribe vegetation management activities.	BVES did not prioritize and complete all open work orders. However, 97% of the work orders were completed on the day the orders were created.

5.3.1 Budget Impact of Not Attained Initiatives

The 10 non-attained initiative activities accounted for \$6.5 million, or 28%, of the planned \$23 million 2023 WMP budget. Of the 10 largest initiatives by budgeted amount, two were not attained and represented a budgeted amount of \$6.2 million, or 33.3%, of the \$18.6 million allocated for these 10 initiatives in 2023. These two initiatives were for the Radford Line replacement project (covered conductor installation and distribution pole replacement related to the Radford Line project).

When accounting for the partial amount that was spent on incomplete initiative activities, \$1.2 million of the original budgeted amount of \$6.5 million for these initiative activities was spent (18.5% of the budget). Five of the 10 initiatives that were not attained did not have any budgeted expenditure.

5.3.2 Risk Impact of Not Attained Initiatives

Energy Safety's WMP Technical Guidelines require an electrical corporation to calculate the relative risk impact of its mitigation activities by subtracting the risk remaining after the mitigation activity is completed from the risk that existed before the mitigation activity

occurred. The electrical corporation is then to divide the risk difference by the risk before the mitigation activity, and finally, multiply the divided number by 100.⁷²

When accounting for the amount of risk targeted for removal by each initiative,⁷³ BVES's 10 missed initiatives impacted the planned risk to be removed. Since BVES did not make any progress on each of the 10 missed initiatives, none of the anticipated risk reduction listed in the WMP was achieved.

The 2023 WMP does not define the total risk that applies to the stated percentage risk reduction. For example, the 2023 WMP does not clarify if the planned risk reduction of 3.6% due to covered conductor installation would lead to a 3.6% reduction of total system-wide risk, a 3.6% reduction of total risk at a given circuit or region, or a 3.6% reduction of some other form of spatial or temporal risk.

As a result, this ARC does not assume the nature of the estimated risk that was to be reduced by the initiatives that were not attained. Rather, Energy Safety observes that the not attained initiatives did not achieve their intended risk reduction.

⁷² 2023 WMP, page 104.

⁷³ As reported by BVES in its 2023 WMP based on its risk models.

6. Ignition Risk, Outcome Metrics, and Inspections

Energy Safety assessed the performance of BVES's infrastructure relative to its wildfire risk, as measured by changes in the occurrence of events that correlate to wildfire risk.

Energy Safety requires electrical corporations to report data, such as ignitions, that help Energy Safety assess whether an electrical corporation reduced its wildfire risk while also reducing its reliance on PSPS events. For 2023, Energy Safety assessed each electrical corporation's infrastructure performance for the calendar years 2016 through 2023 with particular attention on the 2023 outcomes.

The collection of metrics assessed are grouped into two categories: Ignition Risk Metrics, and Outcome Metrics. A list of all the metrics in each category is described fully in their respective following sections. For these sections, Energy Safety relied on data reported in the third quarter 2022 QDR for the 2016 through 2021 values, the fourth quarter 2023 QDR for the 2022 values, and DR-285 response for the 2023 values.^{74,75}

Normalizing Metrics

For applicable performance metrics, the normalizing metrics Energy Safety uses are: "Overhead Circuit Miles" (OCM), "High Wind Warning Overhead Circuit Mile Days" (HWWOCMD), and "Red Flag Warning Overhead Circuit Mile Days" (RFWOCMD). To see the values for each year used, see Appendix C, Figure 7 through Figure 9.

Energy Safety uses these normalizing metrics to ensure a more nuanced interpretation of wildfire risk outcomes. For example, the outcome metric of "acres burned" may be impacted by the presence of hot dry winds and, thus, this metric is presented in both raw counts and normalized by RFWOCMD. In this way, the acres burned are presented accounting for year-by-year variances in weather conditions that may influence the outcome.

Findings

Ignition risk and outcomes metrics findings include:

- There were no ignitions reported by BVES from 2016 through 2023.
- Wire down events for BVES decreased in 2023 relative to 2022.

⁷⁴ The format of the required data reporting for all electrical corporations changed near the end of 2022, thus, all data for 2016-2021 were obtained from the third quarter 2022 QDR (old format) and all data for 2022 was obtained from the fourth quarter 2023 QDR (new format).

⁷⁵ 2022 Q3 QDR; 2023 Q4 QDR; and DR-285 Response.

- Outage events for BVES decreased in 2023 relative to 2022.
- BVES reported no PSPS events from 2016 through 2023.
- BVES reported no wildfire-related outcome events from 2016 through 2023.

6.1 Ignition Risk Metrics

Energy Safety reviewed the following metrics associated with ignition risk:

1. *Ignitions* – Incidents in which electrical corporation infrastructure was involved in an ignition,
2. *Wire Down Events* – Incidents in which overhead electrical lines fall to the ground, land on objects, or become disconnected from their moors,
3. *Unplanned Outages* – All unplanned outages experienced, and
4. *PSPS Events* – Planned outages called PSPS events.

For all of the figures in this section where results are broken out by high fire threat district (HFTD) Tier,⁷⁶ only data for HFTD Tier 2 are displayed as HFTD Tier 2 areas account for over 99% of the overall circuit mileage for BVES.

6.1.1 Ignition Data Analysis

BVES has reported zero ignitions from 2016 to 2023. As a result, there are no raw or normalized ignition figures provided.

6.1.2 Wire Down Events Data Analysis

Wire down events are events where a wire is touching the ground, touching an object, or has become disconnected from its mooring. This type of event poses a risk of ignition or a danger to people if that wire is also energized with electricity. The data source for wire down information is the QDRs.⁷⁷

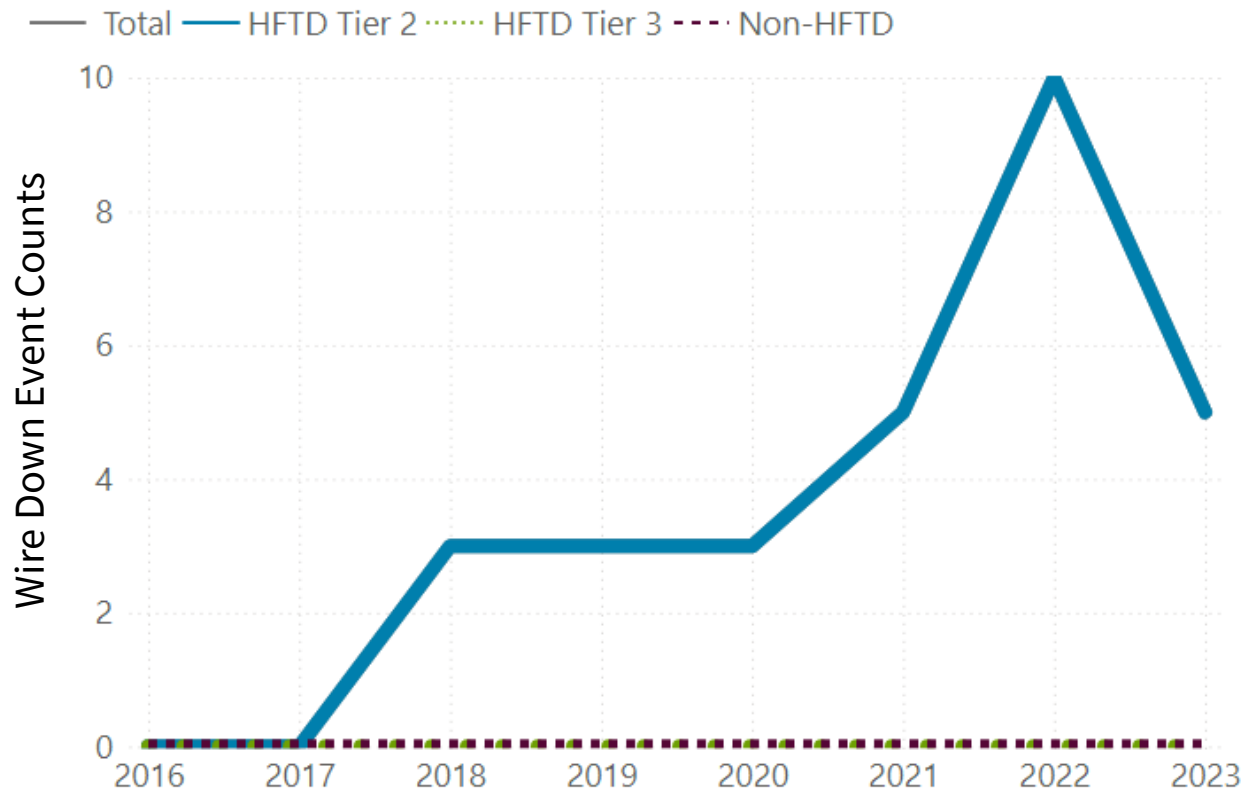
⁷⁶ CPUC HFTD Designation.

⁷⁷ 2022 Q3 QDR, Table 7.1; 2023 Q4 QDR, Table 5.

Raw Wire Down Events

The BVES wire down event counts increased from 2017 to 2022 but decreased in 2023 (Figure 1).

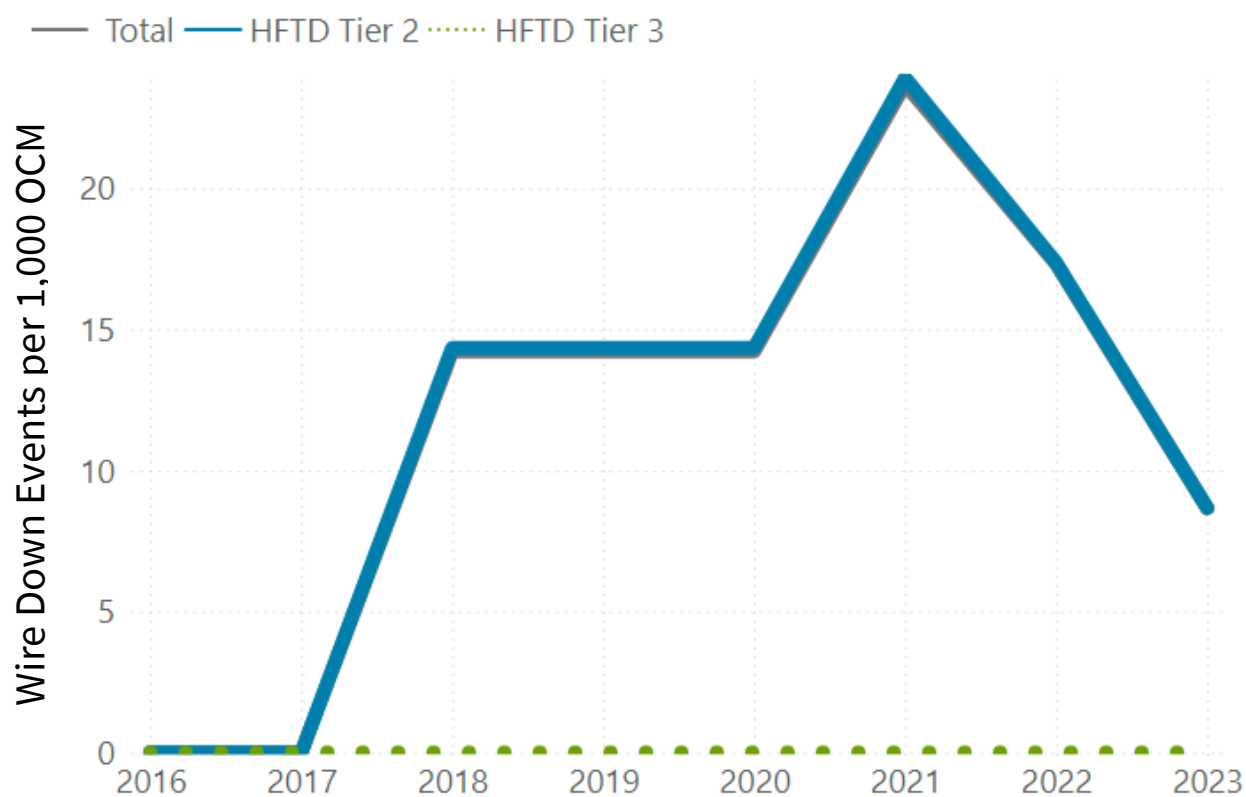
Figure 1. BVES Wire Down Event Counts (2016-2023) by HFTD Tier



Wire Down Events Normalized by Overhead Circuit Miles

When accounting for OCMs, the wire down rates have increased from 2017 to 2021 but exhibited a decrease from 2021 through 2023 due to an increase in OCMs reported by BVES starting in 2022 (Figure 2). The increase of OCMs in 2022 is a result of a change in the reporting by BVES to include secondary line miles, which were not reported in prior years, in addition to primary line miles.

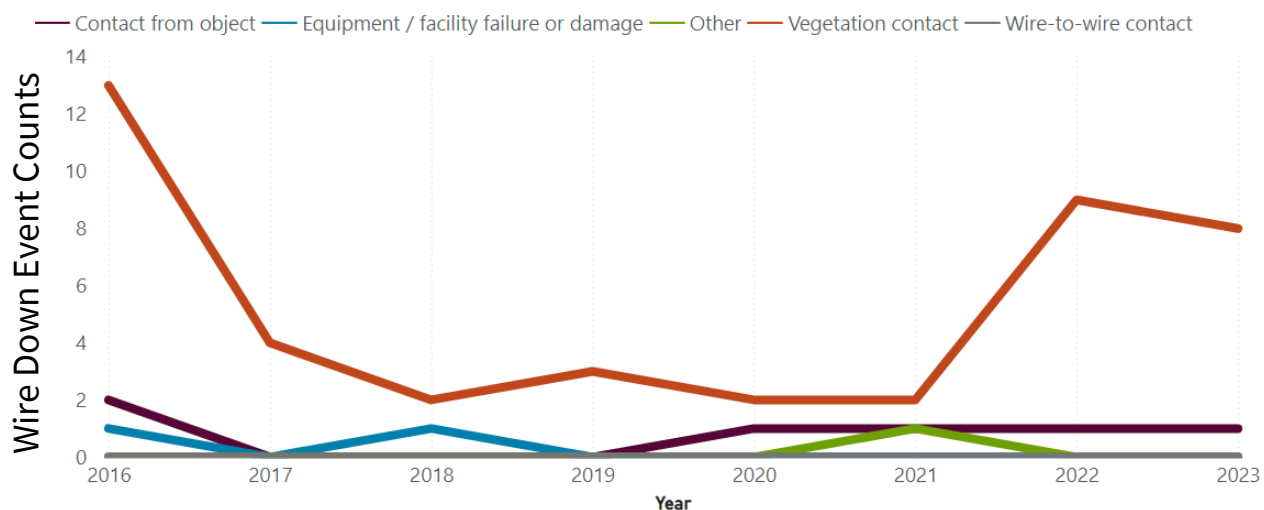
Figure 2. BVES Wire Down Events Normalized by OCM (2016-2023) by HFTD Tier



Wire Down Events Delineated by Risk Driver

BVES raw wire down events are shown delineated by risk drivers to indicate which causes are the most common. BVES wire down events are primarily caused by vegetation contact (Figure 3). Wire to wire contact is the least common cause of wire down events.

Figure 3: BVES Wire Down Events Delineated by Risk Driver



Wire Down Events Normalized by High Wind Warning Overhead Circuit Mile Days and Red Flag Warning Overhead Circuit Mile Days

Please see Appendix C (Figure 10 and Figure 11) for wire down events normalized by HWWOCMD and RFWOCMD.

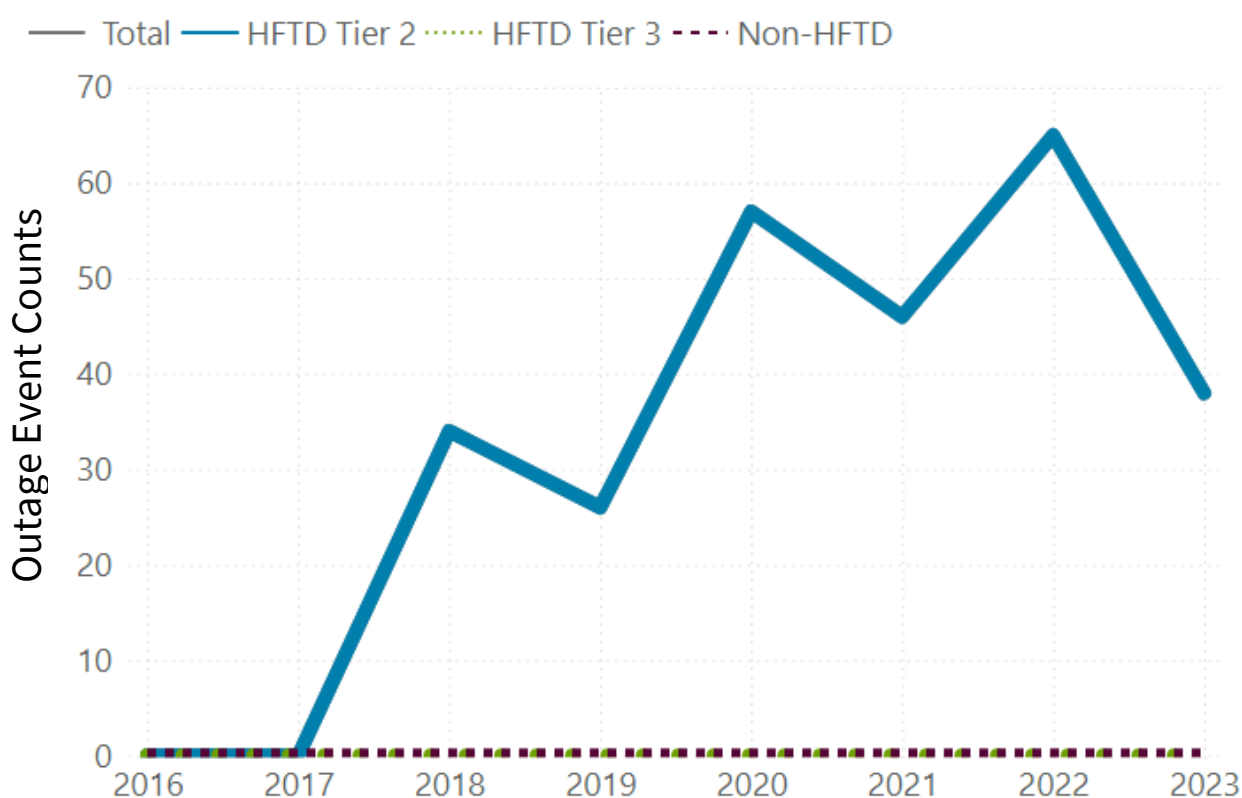
6.1.3 Outage Event Data Analysis

Power outages (outages) are unplanned power outage events (does not include PSPS events) tabulated by circuits and not by number of customers impacted. Outage events are tracked as outcomes that both may cause ignitions and impact a customer's quality of life. The data source for outage event information is the QDRs.⁷⁸

Raw Outage Event Counts

Total unplanned outage events generally increased from 2017 through 2022 before decreasing in 2023 (Figure 4).

Figure 4. BVES Outage Events (2016-2023) by HFTD Tier

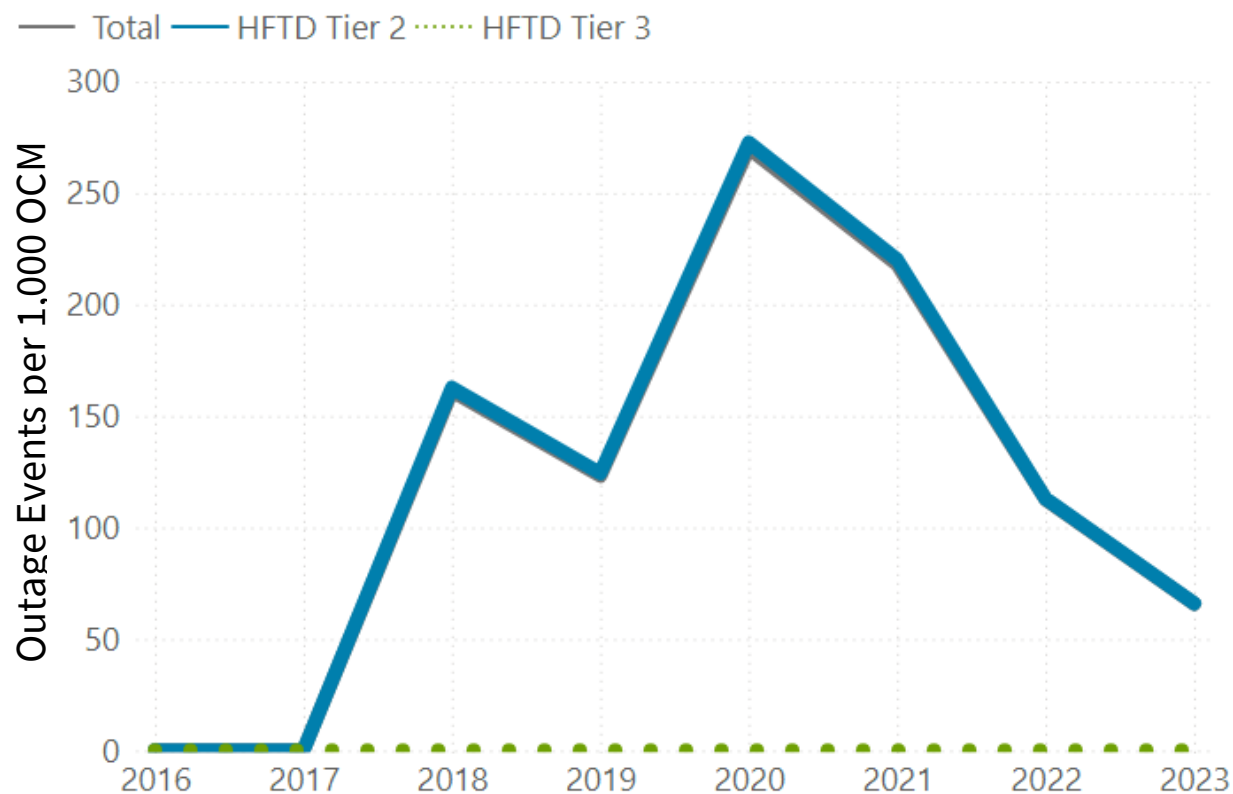


⁷⁸ 2022 Q3 QDR, Table 7.1; 2023 Q4 QDR, Table 5.

Outage Events Normalized by Overhead Circuit Miles

When normalized by OCM, unplanned outage events have increased since 2017 but declined from 2020 to 2023 due to an increase in OCMs reported by BVES starting in 2022 (Figure 5). The increase of OCMs in 2022 is a result of a change in the reporting requirements enacted for 2022 that is not reflected in prior years.

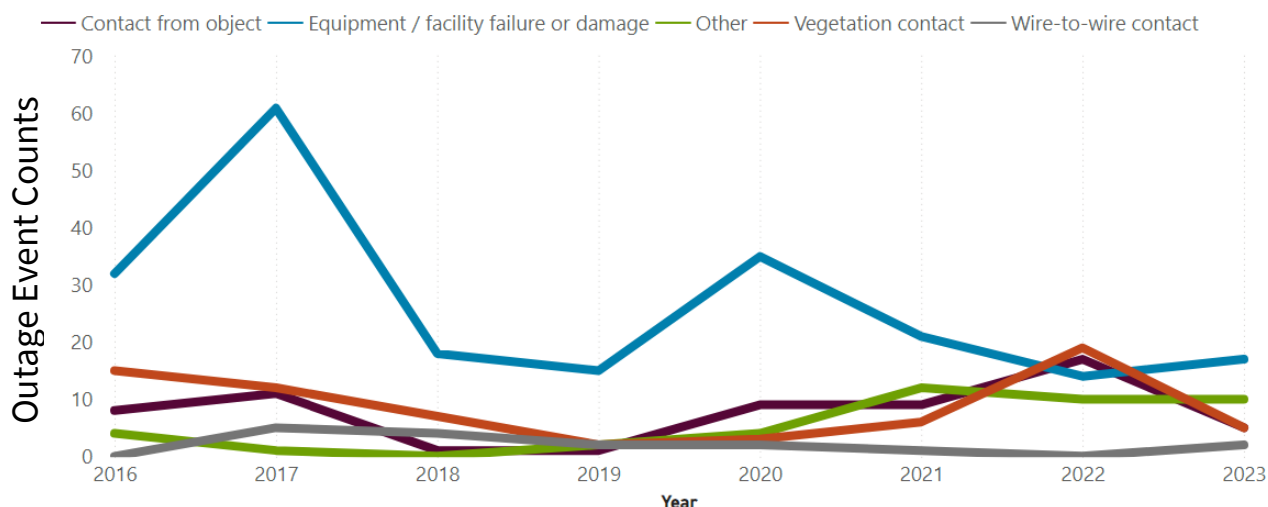
Figure 5. BVES Outage Events Normalized by OCM (2016-2023) by HFTD Tier



Outage Events Delineated by Risk Driver

To show which causes are the largest contributors to unplanned outage events, the raw outage event counts are broken out by risk drivers and shown relative to each other (Figure 5). BVES outage events are primarily caused by equipment or facility failure. Wire to wire contact is the least common cause for outage events.

Figure 6. BVES Outage Events (2016-2023) by Risk Driver



Outage Events Normalized by High Wind Warning Overhead Circuit Mile Days and Red Flag Warning Overhead Circuit Mile Days

Please see Appendix C (Figure 12 and Figure 13) for outage events normalized by HWWOCMD and RFWOCMD.

6.1.4 Public Safety Power Shutoff Event Data Analysis

PSPS events are planned outages used as a wildfire mitigation tool during extreme fire conditions such as hot, dry, and windy days. While useful as a wildfire mitigation measure, PSPS events carry their own risks and adverse impacts on customers – particularly vulnerable customers who need electricity to survive. As such, electrical corporations take mitigating actions to reduce the frequency, scope, duration, and impacts of PSPS events.

BVES has not recorded any PSPS events from 2016 through 2022.⁷⁹ Therefore, no analysis of BVES PSPS events is provided.

⁷⁹ 2022 Q3 QDR, Table 11; 2023 Q4 QDR, Table 10.

6.2 Outcome Metrics

This section presents outcome metrics on electrical corporation-related wildfires including:

1. *Acres burned* – The total number of acres burned due to electrical corporation caused fires,
2. *Structures damaged/destroyed* - The total number of structures damaged or destroyed due to electrical corporation caused fires,
3. *Injuries/fatalities* - The total number of injuries and fatalities due to electrical corporation caused fires, and
4. *Value of assets destroyed* - The total value of assets destroyed due to electrical corporation caused fires.

From 2016 to 2023, BVES reported no wildfire related outcome events.⁸⁰ Therefore, no analysis of BVES wildfire related outcome metrics is provided.

6.3 Energy Safety Field Inspection Analysis

Energy Safety performs inspections utilizing an electrical corporation's initiative activity data applicable to the WMP year compliance period. Energy Safety conducts two types of inspections: 1) inspections of grid hardening and other work related to WMP initiatives related to physical infrastructure, and 2) inspections of general wildfire safety conditions at an inspection site. The second category of general wildfire safety conditions is not strictly related to WMP initiatives, and these inspections are additional to Energy Safety's WMP initiative-related inspection work.⁸¹

For the 2023 compliance period, Energy Safety conducted 1,848 general wildfire safety (GWS) inspection activities and 366 WMP inspection activities in BVES's territory. Energy Safety did not issue any Notices of Violation or Notices of Defect to BVES in 2023.

⁸⁰ 2022 Q3 QDR, Table 2; 2023 Q4 QDR, Table 2.

⁸¹ If Energy Safety observes a general wildfire safety concern during an inspection activity, then that is recorded as a "Wildfire Safety Concern." Or as it was known prior to 2024, a "defect." If Energy Safety observes noncompliance with a WMP initiative during an inspection activity that an electrical corporation claimed to have occurred at a site, then that is recorded as a "violation." For example, if Energy Safety is inspecting a particular utility pole and looking for eight different conditions associated with a WMP initiative, then that would count as eight WMP inspection activities. If a general wildfire safety inspection occurs at the same time at that utility pole, and 20 general wildfire safety concerns are assessed, then that would count as 20 general wildfire safety inspection activities. In this example, a single utility pole inspection would lead to a total of 28 inspection activities.

6.4 Energy Safety Analysis of Reporting Accuracy and Completeness

Reports required by Public Utilities Code section 8386 are intended to inform Energy Safety of electrical corporations' compliance with its wildfire mitigation plan initiative activities. This section considers whether BVES exhibited issues related to its execution, management, or documentation in the implementation of its 2023 WMP. To accomplish this, Energy Safety undertook a holistic assessment of all relevant information sources and assessments, including field verifications, for any systemic failings that may have hindered BVES's ability to reduce the risk of igniting a catastrophic wildfire.

Energy Safety's assessment of BVES's documentation and reporting in 2023 found examples of cases where data on targets and actual attainments were either missing or unaccounted for. The EC ARC did not explicitly list and report attainments for 2023 WMP activities, but did mention achievements regarding 18 of the 65 2023 WMP activities assessed by Energy Safety. In addition, the 2023 WMP and QDR reported inconsistent targets for nine of the 65 WMP initiatives. More details about these inconsistencies can be found in the table in Appendix A.

Taken together, this analysis shows that BVES should continue to improve the reporting methods of its WMP implementation documenting practices in its EC ARC. Energy Safety will monitor BVES and expect improvements regarding the accuracy of BVES's documentation and tracking processes going forward.

7. Conclusion

BVES completed 55 of 65 (85%) of its 2023 WMP initiatives. However, BVES failed to meet its commitments for 10 of its WMP initiatives for 2023, including two of the 10 initiatives with the largest planned expenditures. To assess the impact of these missed initiatives, the budgets and targeted risk reductions are considered.

The total amount budgeted for the 10 initiative activities not attained was \$6.5 million, or 29% of the total \$22.8 million in the 2023 WMP budget. Of the 10 largest initiatives by budgeted amount, two were not attained and represented a budgeted amount of \$6.2 million, or 33%, of the \$18.6 million allocated for these 10 initiatives in 2023. When accounting for the partial amount that was spent on all 10 incomplete initiative activities, \$1.2 million of the original budgeted amount of \$6.5 million for these unattained initiative activities was spent (18% of the budget).

In consideration of the \$22.8 million overall 2023 WMP budget, BVES spent over the planned amounts on its 2023 WMP initiatives by \$6.3 million, or 28% above the original budget.

Ignition risk and outcomes metrics findings include:

- There were no ignitions reported by BVES from 2016 through 2023.
- Wire down events for BVES decreased in 2023 relative to 2022.
- Outage events for BVES decreased in 2023 relative to 2022
- BVES recorded no PSPS events from 2016 through 2023.
- BVES recorded no wildfire-related outcome events from 2016 through 2023.

In the 2023 EC ARC, BVES did not report on 47 of the 65 initiative activities assessed by Energy Safety. This inadequate reporting suggests that reporting consistency and accuracy issues existed during the 2023 compliance year. In light of this, BVES should improve the level of detail, accuracy, and consistency of its EC ARC documentation going forward.

Energy Safety acknowledges that in 2023 BVES undertook efforts to reduce its wildfire risk, and in many instances achieved its WMP initiative activity targets. However, the failure to meet targets related to work on the Radford Line after several years of ongoing delay represents a missed opportunity for BVES to reduce risk on its system.

On balance, BVES was successful in executing its plan for wildfire risk mitigation in that few initiatives were left incomplete. The incomplete Redford line initiatives nonetheless impeded BVES's ability to mitigate its risk. In addition, there are still areas to improve upon and opportunities to continue learning and increase detail in the EC ARC. Energy Safety will continue to monitor BVES's implementation of its ongoing wildfire mitigation activities to push BVES to improve its ability to eliminate utility-caused catastrophic wildfires in California.

8. References

Table 33. Full References for Citations

Citation	Reference
2023 Q4 QDR	Bear Valley Electric Service, Inc., <u>BVES 2023 QDR Table1-15 R0</u> , Published February 1, 2024. URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56262&shareable=true).
2023 WMP	Bear Valley Electric Service, Inc., <u>2023-2025 Wildfire Mitigation Plan</u> , Published August 22, 2023, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=54542&shareable=true).
Compliance Guidelines	Office of Energy Infrastructure Safety, <u>Compliance Guidelines</u> , Published September 2023, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true).
Compliance Process	Office of Energy Infrastructure Safety, <u>Compliance Process</u> , Published September 2024, URL: (https://energysafety.ca.gov/wp-content/uploads/2024/12//2024-wmp-compliance-process.pdf).
CPUC HFTD Designation	California Public Utilities Commission, “ <u>Fire-Threat Maps and Fire-Safety Rulemaking</u> ,” July 28, 2025, URL: (https://www.cpuc.ca.gov/industries-and-topics/wildfires/fire-threat-maps-and-fire-safety-rulemaking).
DR-285 Response	Bear Valley Electric Service, Inc., Accessed November 22, 2024, DR-285 Response, April 2025, unpublished.
EC ARC	Bear Valley Electric Service, Inc., <u>BVES ARC for 2023 WMP</u> , Published April 1, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56434&shareable=true).

Citation	Reference
IE ARC	Bureau Veritas, <u>Bear Valley Electric Company 2023 Wildfire Mitigation Plan Independent Evaluator Annual Report on Compliance</u> , Published June 30, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57097&shareable=true).
Pub. Util. Code	<u>Public Utilities Code</u> , URL: (https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=PUC&tocTitle=+Public+Utilities+Code+-+PUC).
SVM Audit	Office of Energy Infrastructure Safety, <u>BVES 2023 SVM Audit</u> , Published March 3, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58044&shareable=true).
SVM Audit Report	Bear Valley Electric Service, Inc., <u>BVES 2023 SVM Audit Report</u> , Published June 17, 2025 URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true).
SVM Audit Corrective Action Plan	Bear Valley Electric Service, Inc., <u>BVES 2023 SVM Corrective Action Plan</u> , Published April 2, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58199&shareable=true).
WMP Decision	Office of Energy Infrastructure Safety, <u>Decision on BVES's 2023-2025 Wildfire Mitigation Plan</u> , Published September 21, 2023, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55628&shareable=true).
WMP Technical Guidelines	Office of Energy Infrastructure Safety, <u>2023-2025 WMP Technical Guidelines</u> , Published January 7, 2022, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

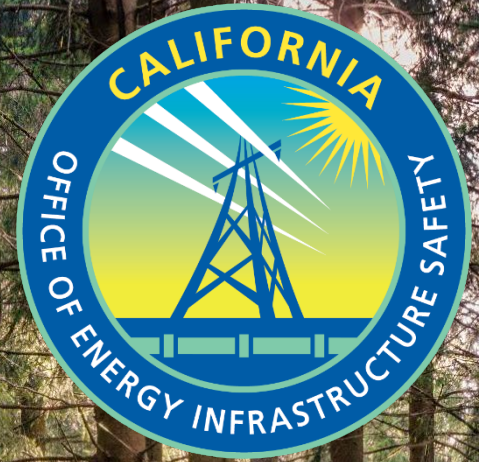
DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



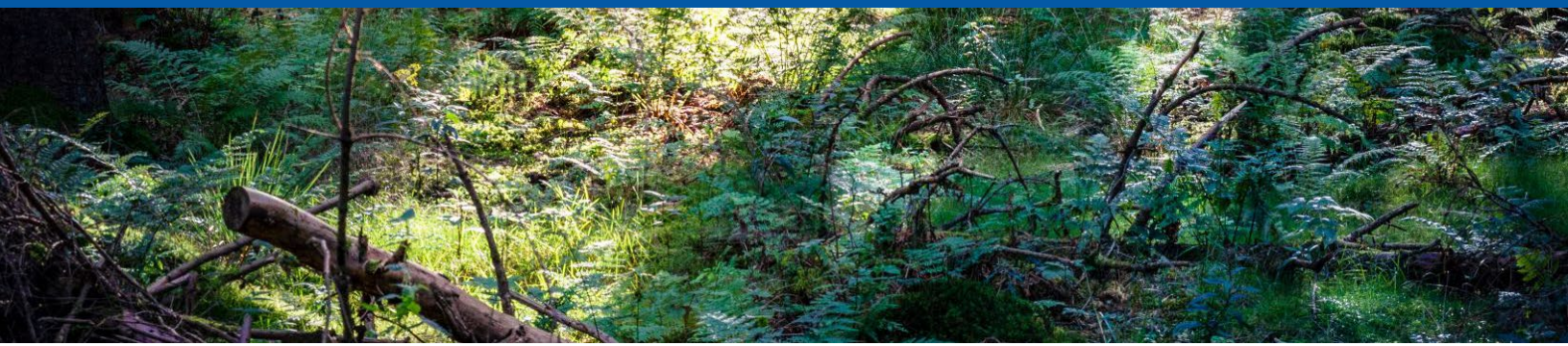
OFFICE OF ENERGY INFRASTRUCTURE SAFETY
A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 15th Floor
Sacramento, CA 95814





APPENDICES



9. Appendices

Appendix A: BVES Information on WMP Initiative Activity Attainment

Below, Table 4. BVES WMP initiative Activity Attainment Information summarizes each of BVES's 65 initiative activity targets from its 2023 WMP, BVES's self-reporting on compliance contained in its submission response to Energy Safety DR-285, the EC ARC, the IE ARC, the SVM Audit, and the SVM Audit Report.⁸²

Table 4. BVES WMP Initiative Activity Attainment Information⁸³

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Covered Conductor Installation 8.1.2.1 GD_1	12.9 circuit miles	Met Target: 12.9 miles Actual: 20.7 miles	Met Target: 12.9 miles Actual: 20.7 miles	Met Target: 12.9 miles Actual: 20.7 miles	Met	\$4,786	\$11,630

⁸² 2023 Q4 QDR; DR-285, EC ARC; IE ARC; and SVM Audit and Report.

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Radford Line-related Covered Conductor Installation 8.1.2.1 GD_2	2.7 circuit miles	Not met Target: 2.7 miles Actual: Zero miles	Not met Target: Missing Actual: Zero miles	Not met Target: 2.7 miles Actual: Zero miles	Not met	\$4,340	\$117
Radford Line-related Minor Undergrounding Upgrades Projects 8.1.2.2 GD_3	100% of budget	Not met Target: Missing Actual: No proposed budget	Missing Target: Missing Actual: Missing	Not met Target: Missing Actual: No projects proposed or initiated	Not met	\$200	\$725
Distribution Pole Replacements and Reinforcements 8.1.2.2 GD_4	200 poles replaced	Met Target: 200 poles Actual: 309 poles	Met Target: 200 poles Actual: 309 poles	Met Target: 200 poles Actual: 309 poles	Met	\$2,051	\$4,984

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Radford Line-related Distribution Pole Replacements and Reinforcements 8.1.2.3 GD_5	70 poles replaced	Not met Target: 70 poles Actual: Zero poles	Missing Target: Missing Actual: Missing	Not met Target: 70 poles Actual: Activity delayed	Not met	\$1,860	\$50
Distribution Pole Replacements and Reinforcements 8.1.2.3 GD_6	500 poles installed with wire mesh	Met Target: 500 poles Actual: 909 poles	Met Target: 500 poles Actual: 909 poles	Met Target: 500 poles Actual: 909 poles	Met	\$816	\$406
Traditional Overhead Hardening 8.1.2.5 GD_8	100% of budget	Met Target: Missing Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$500	\$1,318

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Substation Automation 8.1.2.8 GD_12	Three substations automated and connected to SCADA	Met Target: Three substations automated and connected to SCADA Actual: Three substations automated and connected to SCADA	Met Target: Missing Actual: Three substations automated and connected to SCADA	Met Target: Three substations automated and connected to SCADA Actual: Three substations automated and connected to SCADA	Met	\$654	\$676
Installation of System Automation Equipment 8.1.2.8 GD_13	13 Field switches automated and connected to SCADA	Met Target: 13 field switches automated Actual: 13 field switches automated	Met Target: Missing Actual: 13 field switches automated	Met Target: 13 switches Actual: 13 switches	Met	\$711	\$667

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Installation of System Automation Equipment 8.1.2.8 GD_14	Six capacitor banks replaced and connected to SCADA	Met Target: Six capacitor banks Actual: Six capacitor banks	Met Target: Missing Actual: Six capacitor banks	Met Target: Six installs Actual: Six installs	Met	\$345	\$166
Installation of System Automation Equipment 8.1.2.8 GD_15	10 fuse TripSavers automated and connected to SCADA	Met Target: 10 fuse TripSavers automated Actual: 10 fuse TripSavers automated	Missing Target: Missing Actual: Missing	Met Target: 10 installs Actual: 12 installs	Met	\$198	\$219

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Installation of System Automation Equipment 8.1.4.8 GD_16	32% of project milestones for server installation	Met Target: Missing Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity in progress	Met	\$127	\$24
Other Grid Topology Improvements to Minimize Ignitions 8.1.2.10 GD_19	100 tree attachments removed	Met Target: 100 tree attachments Actual: 114 tree attachments	Met Target: 100 tree attachments Actual: 114 tree attachments	Met Target: 100 tree attachments Actual: 114 tree attachments	Met	\$606	\$699
BVPP Phase 4 Upgrade Project GD_21	32% of project milestones for natural engine upgrades	Not met Target: Project milestones Actual: Not started	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity in progress	Not met	\$0	\$0

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Other Technologies and Systems Not Listed Above 8.1.2.12 GD_22	32% of project milestones for Maltby Substation	Not met Target: Missing Actual: Not started	Missing Target: Missing Actual: Missing	Missing Target: Missing Actual: Missing	Not met	\$0	\$0
Other Technologies and Systems Not Listed Above 8.1.2.12 GD_23	32% of project milestones for Lake Substation	Not met Target: Missing Actual: Not started	Missing Target: Missing Actual: Missing	Net met Target: Missing Actual: Activity delayed	Not met	\$0	\$0
Other Technologies and Systems Not Listed Above 8.1.2.12 GD_24	32% of project milestones for Village Substation	Not met Target: Missing Actual: Not started	Missing Target: Missing Actual: Missing	Not Met Target: Missing Actual: Not started	Not met	\$0	\$0

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Detailed Inspection Program 8.1.3.1 GD_25	134 circuit miles inspected	Met Target: 134.5 miles Actual: 135 miles	Missing Target: Missing Actual: Missing	Met Target: 135 miles Actual: 135 miles	Met	\$14	\$20
Patrol Inspection Program 8.1.3.2 GD_26	211 circuit miles inspected	Met Target: 206.7 miles Actual: 205.2 miles ⁸⁴	Missing Target: Missing Actual: Missing	Met Target: 205 miles Actual: 28 structures, 24 inspection reports ⁸⁵	Met	\$32	\$46

⁸⁴ Several inspection initiatives have an actual value of 205.2 miles as this is the extent of BVES's primary network. Recent GIS technology improvements provided this more accurate estimate in place of the prior estimate of 211 miles.

⁸⁵ Energy Safety reviewed documents requested by the IE and were not able to verify this number of structures equates to 205.2 circuit miles.

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
UAV Thermography 8.1.3.3 GD_27	211 circuit miles inspected	Met Target: 206.7 miles Actual: 205.2 miles ⁸⁶	Missing Target: Missing Actual: Missing	Met Target: 205 miles Actual: 1,807 Structures, tied to circuit miles	Met	\$56	\$57
UAV HD Photography and Videography 8.1.3.4 GD_28	211 circuit miles inspected	Met Target: 206.7 miles Actual: 205.2 miles ⁸⁷	Missing Target: Missing Actual: Missing	Met Target: 205 miles Actual: 156 substation reports	Met	\$56	\$22

⁸⁶ Several inspection initiatives have an actual value of 205.2 miles as this is the extent of BVES's primary network. Recent GIS technology improvements provided this more accurate estimate in place of the prior estimate of 211 miles.

⁸⁷ Several inspection initiatives have an actual value of 205.2 miles as this is the extent of BVES's primary network. Recent GIS technology improvements provided this more accurate estimate in place of the prior estimate of 211 miles.

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
LiDAR Inspections 8.1.3.5 GD_29	211 circuit miles inspected	Met Target: 206.7 miles Actual: 205.2 miles ⁸⁸	Missing Target: Missing Actual: Missing	Met Target: 205 miles Actual: Bear Valley online portal	Met	\$58	\$70
Third Party Ground Patrol 8.1.3.6 GD_30	211 circuit miles inspected	Met Target: 206.7 miles Actual: 205.2 miles ⁸⁹	Missing Target: Missing Actual: Missing	Met Target: 205 miles Actual: 6,544 structure locations	Met	\$47	\$22

⁸⁸ Several inspection initiatives have an actual value of 205.2 miles as this is the extent of BVES's primary network. Recent GIS technology improvements provided this more accurate estimate in place of the prior estimate of 211 miles.

⁸⁹ Several inspection initiatives have an actual value of 205.2 miles as this is the extent of BVES's primary network. Recent GIS technology improvements provided this more accurate estimate in place of the prior estimate of 211 miles.

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Intrusive Pole Inspections 8.1.3.7 GD_31	850 poles intrusively inspected	Met Target: 850 poles Actual: 850 poles	Met Target: Missing Actual: 850 poles	Met Target: 850 poles Actual: 1,008 entries	Met	\$19	\$20
Substation Inspection 8.1.3.8 GD_32	144 substations inspected	Met Target: 144 substation inspections Actual: 144 substation inspections	Missing Target: Missing Actual: Missing	Met Target: 144 substations Actual: 156 inspection reports	Met	\$275	\$845
Equipment Maintenance and Repair (Connectors, Including Hotline Clamps) 8.1.4.3 GD_33	As needed maintenance (% of budget), pending results of inspections programs	Met Target: As needed maintenance Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity in progress	Met	\$1,042	\$2,158

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Asset Management and Inspection Enterprise System(s) 8.1.5 GD_34	100% of maintenance of all asset management systems. Activities include migration to cloud based software, additional inventory trackers, continued updates, and adding PPS thresholds	Not met Target: Missing Actual: Not started	Missing Target: Missing Actual: Missing	Not met Target: Missing Actual: Not started	Not Met	\$56	\$260

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Quality Assurance and Quality Control 8.1.6 GD_35	20 asset QCs on WMP work	Met Target: 20 asset QCs on WMP work Actual: 20 asset QCs on WMP work	Not met Target: Missing Actual: Missing	Met Target: 20 asset QCs on WMP work Actual: 20 asset QCs on WMP work	Met	\$20	\$22
Open Work Orders 8.1.7 GD_36	All work orders resolved within GO 95 timeframe	Met Target: Missing Actual: Yearly target met	Not met Target: Missing Actual: Missing	Met Target: Missing Actual: Activity in progress	Met	\$17	\$19
Equipment Settings to Reduce Wildfire Risk 8.1.8.1 GD_37	Review and evaluate system settings	Met Target: Missing Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$5	\$6

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Grid Response Procedures and Notifications 8.1.8.2 GD_38	Review and update procedure annually	Met Target: Missing Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$9	\$10
Personnel Work Procedures and Training in Conditions of Elevated Fire Risk 8.1.8.3 GD_39	Review and update procedures annually. Verifications of training annually	Met Target: Missing Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$4	\$4
Workforce Planning 8.1.9 GD_40	Verify appropriate staffing levels for wildfire related activities	Met Target: Missing Actual: Staffing level verified	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity ongoing	Met	\$6	\$7

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Detailed Inspections 8.2.2.1 VM_1	134 circuit miles inspected	Met Target: 134.5 miles Actual: 135 miles	Missing Target: Missing Actual: Missing	Met Target: 134.5 miles Actual: 140.7 miles	Met	\$14	\$20
Patrol Inspections 8.2.2.2 VM_2	211 circuit miles inspected	Met Target: 206.7 miles Actual: 205.2 miles ⁹⁰	Missing Target: Missing Actual: Missing	Met Target: 205.2 miles Actual: 205.7 miles	Met	\$32	\$46
UAV HD Photography and Videography 8.1.2.3 VM_3	211 circuit miles inspected	Met Target: 206.7 miles Actual: 205.2 miles ⁹¹	Not met Target: Missing Actual: Missing	Met Target: 205.2 miles Actual: 205.7 miles	Met	\$58	\$55

⁹⁰ Several inspection initiatives have an actual value of 205.2 miles as this is the extent of BVES's primary network. Recent GIS technology improvements provided this more accurate estimate in place of the prior estimate of 211 miles.

⁹¹ Several inspection initiatives have an actual value of 205.2 miles as this is the extent of BVES's primary network. Recent GIS technology improvements provided this more accurate estimate in place of the prior estimate of 211 miles.

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
LiDAR Inspections 8.2.2.4 VM_4	211 circuit miles inspected	Met Target: 206.7 miles Actual: 205.2 miles ⁹²	Missing Target: Missing Actual: Missing	Met Target: 205.2 miles Actual: 205.7 miles	Met	\$58	\$70
Third Party Ground Patrol 8.2.2.5 VM_5	211 circuit miles inspected	Met Target: 206.7 miles Actual: 205.2 miles ⁹³	Missing Target: Missing Actual: Missing	Met Target: 205.2 miles Actual: 205.7 miles	Met	\$47	\$22

⁹² Several inspection initiatives have an actual value of 205.2 miles as this is the extent of BVES's primary network. Recent GIS technology improvements provided this more accurate estimate in place of the prior estimate of 211 miles.

⁹³ Several inspection initiatives have an actual value of 205.2 miles as this is the extent of BVES's primary network. Recent GIS technology improvements provided this more accurate estimate in place of the prior estimate of 211 miles.

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Substation Inspection 8.2.2.6 VM_6	211 circuit miles inspected	Met Target: 144 substations Actual: 144 substation inspections	Met Target: Missing Actual: 144 substation inspections	Met Target: 144 substations Actual: 156 substation inspections	Met	\$4	\$5
Pole Clearing 8.2.3.1 VM_7	Plan and execution of vegetation removal around poles per Public Resources Code section 4292	Missing Target: Missing Actual: Needs met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Not met ⁹⁴	\$0	\$0

⁹⁴ SVM Audit and Report, pages 6-8.

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Wood and Slash Management 8.2.3.2 VM_8	Waste removal requirements met	Met Target: Missing Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$417	\$454
Clearance 8.2.3.3 VM_9	72 circuit miles cleared	Met Target: 72 miles Actual: 72 Miles	Missing Target: Missing Actual: Missing	Met Target: 72 miles Actual: 72 miles	Met	\$1,762	\$1,935
Fall-in Mitigation 8.2.3.4 VM_10	88 trees remediated or removed to prevent fall-in	Met Target: 88 trees Actual: 168 trees	Met Target: Missing Actual: 168 trees	Met Target: 88 trees Actual: 168 trees	Met	\$283	\$296

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Substation Defensible Space 8.2.3.5 VM_11	13 substations inspected and cleared	Met Target: 13 substations Actual: 13 substations	Missing Target: Missing Actual: Missing	Met Target: 13 substations Actual: 13 substations	Met	\$15	\$14
High-risk Species 8.2.3.6 VM_12	WMP plan review and vegetation discussion with experts	Met Target: Missing Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$283	\$306
Fire-resilient Right-of-Way 8.2.3.7 VM_13	WMP plan review and vegetation discussion with experts	Not met Target: Missing Actual: Not started	Missing Target: Missing Actual: Missing	Not met Target: Missing Actual: Activity not started	Met	\$14	\$14

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Emergency Response Vegetation Management 8.2.3.8 VM_14	Verification of readiness and review of plan	Met Target: Missing Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$25	\$29
Vegetation Enterprise System 8.2.4 VM_15	100% monitoring and maintenance	Met Target: Review and update procedures Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$21	\$26
Quality Assurance and Quality Control 8.2.5 VM_16	72 vegetation QCs	Met Target: Five audits Actual: Five audits	Met Target: Missing Actual: Five audits	Met Target: Five audits Actual: Five audits	Met	\$46	\$53

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Open Work Orders 8.2.6 VM_17	All work orders resolved within GO 95 timeframe	Met Target: Missing Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Not met ⁹⁵	\$31	\$35
Workforce Planning 8.2.7 VM_18	Staffing level verified	Met Target: Missing Actual: Met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$6	\$7

⁹⁵ SVM Audit Report, pages 8-11.

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Environmental Monitoring System and Advanced Weather Monitoring and Weather Stations SAF_1	100% monitoring and maintenance of weather stations	Met Target: Maintain established weather stations Actual: Met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$7	\$9
Install Fault Indicators (FIs) 8.3.3.3 SAF_2	30 FIs installed	Met Target: 30 FIs Actual: 35 FIs	Met Target: Missing Actual: 35 FIs	Met Target: 30 FIs Actual: 35 FIs	Met	\$360	\$20
Online Diagnostic System 8.1.2.8 SAF_3	Two circuits installed per year	Met Target: One circuit Actual: Two circuits	Missing Target: Missing Actual: Missing	Met Target: One circuit Actual: Two circuits	Met	\$78	\$24

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Weather Forecasting 7.2.1 SAF_5	100% monitoring and maintenance (to keep proper functionality year-round)	Met Target: Ongoing monitoring and maintenance Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity in progress	Met	\$51	\$70
Fire Potential Index 8.3.6 SAF_6	100% monitoring and maintenance (to keep proper functionality year-round)	Met Target: Ongoing monitoring and maintenance Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$39	\$58

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Emergency Preparedness Plan 8.4.2.1 EP_1	Review and evaluation of emergency plan	Met Target: Review and evaluate emergency plan Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$5	\$5
External Collaboration and Coordination 8.4.3.1 EP_2	Meetings with community partners and mutual aid groups	Met Target: Meetings with community partners and mutual aid groups Actual: Yearly target met	Not met Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$21	\$23

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Public Emergency Communication Strategy 8.4.4 EP_3	Review and evaluation of communication strategy	Met Target: Review and evaluate emergency program and communication strategy Actual: Yearly target met	Not met Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$4	\$5
Preparedness and Planning for Service Restoration 8.4.5.1 EP_4	Update service restoration plan with operations group	Met Target: Review and evaluate PSPS program Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$6	\$6

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Customer Support in Wildfire PPS Emergencies 8.4.6 EP_5	Review and evaluate PPS program	Met Target: Review and evaluate PPS program Actual: Yearly target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$3	\$4
Public Outreach and Education on Awareness Program 8.4.3.2 COE_1	360 public outreach and education events	Met Target: 360 public outreach and education events Actual: 829 public outreach and education events	Missing Target: Missing Actual: Missing	Met Target: 360 public outreach and education events Actual: 919 Events	Met	\$90	\$91

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Engagement With Access and Functional Needs Populations 8.4.4.1 COE_2	12 engagement events with Access and Functional Needs customers	Met Target: 12 customers' needs verification Actual: 24 customers' needs verification	Missing Target: Missing Actual: Missing	Met Target: 12 customers' needs verification Actual: 20 engagements	Met	\$30	\$33
Collaboration on Local Wildfire Mitigation Planning 8.4.6 and 8.5.2 COE_3	Develop program, plans, programs, and policies for collaborating with communities on local wildfire mitigation planning	Met Target: Engage with local support (Fire Department and Forestry) on project status and other items Actual: Target met	Missing Target: Missing Actual: Missing	Met Target: Missing Actual: Activity validated	Met	\$23	\$23

2023 WMP Initiative	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Best Practice Sharing with Other Utilities 8.4.6 and 8.5.2 COE_4	Attend work groups, conferences that share best practices of WMP programs	Met Target: 15 working group and conferences Actual: 120 working group and conferences	Missing Target: Missing Actual: Missing	Met Target: 15 working group and conferences Actual: 120 working group and conferences	Met	\$15	\$17

Appendix B: Substantial Vegetation Management Audit of BVES

On March 3, 2025, Energy Safety issued its SVM Audit for BVES.

In the SVM Audit, Energy Safety analyzed 13 initiatives and found three initiatives where BVES did not perform all required work and required BVES to provide a response in its Corrective Action Plan.

After reviewing BVES's Corrective Action Plan, filed on April 2, 2025, Energy Safety issued its SVM Audit Report on June 17, 2025. The SVM Audit Report concluded that, of the 13 vegetation management initiatives considered, BVES did not substantially comply with two vegetation management initiatives: Pole Clearing (8.2.3.1) and Open Work Orders (8.2.6).

The findings from Energy Safety's SVM Audit Report are summarized in Table 5.

Table 5. Summary of Energy Safety Findings from BVES 2023 SVM Audit and Audit Report of WMP Vegetation Management Initiatives

2023 WMP Initiative Tracking ID	2023 WMP Initiative Name	SVM Audit Determination	SVM Audit Report Determination
8.2.2 Vegetation Inspections (VM_1)	8.2.2.1-6 Vegetation Management Inspections	Completed all work	Not addressed in SVM Audit Report
8.2.3 Vegetation and Fuels Management (VM_7)	8.2.3.1 Pole Clearing	Did not complete all work	Did not substantially comply
8.2.3 Vegetation and Fuels Management (VM_8)	8.2.3.2 Wood and Slash Management	Completed all work	Not addressed in SVM Audit Report
8.2.3 Vegetation and Fuels Management (VM_9)	8.2.3.3 Clearance	Completed all work	Not addressed in SVM Audit Report

2023 WMP Initiative Tracking ID	2023 WMP Initiative Name	SVM Audit Determination	SVM Audit Report Determination
8.2.3 Vegetation and Fuels Management (VM_10)	8.2.3.4 Fall-In Mitigation	Completed all work	Not addressed in SVM Audit Report
8.2.3 Vegetation and Fuels Management (VM_11)	8.2.3.5 Substation Defensible Space	Completed all work	Not addressed in SVM Audit Report
8.2.3 Vegetation and Fuels Management (VM_12)	8.2.3.6 High-Risk Species	Completed all work	Not addressed in SVM Audit Report
8.2.3 Vegetation and Fuels Management (VM_13)	8.2.3.7 Fire-Resilient Rights-of-Way	Completed all work	Not addressed in SVM Audit Report
8.2.3 Vegetation and Fuels Management (VM_14)	8.2.3.8 Emergency Response Vegetation Management	Completed all work	Not addressed in SVM Audit Report
8.2.4 Vegetation Management Enterprise System (VM_15)	8.2.4 Vegetation Management Enterprise System	Completed all work	Not addressed in SVM Audit Report
8.2.5 Quality Assurance and Quality Control (VM_16)	8.2.5 Quality Assurance and Quality Control	Completed all work	Not addressed in SVM Audit Report
8.2.6 Open Work Orders (VM_17)	8.2.6 Open Work Orders	Did not complete all work	Did not substantially comply

2023 WMP Initiative Tracking ID	2023 WMP Initiative Name	SVM Audit Determination	SVM Audit Report Determination
8.2.7 Workforce Planning (VM_18)	8.2.7 Workforce Planning	Did not complete all work	Substantially complied

Appendix C: Additional Ignition Risk Analyses

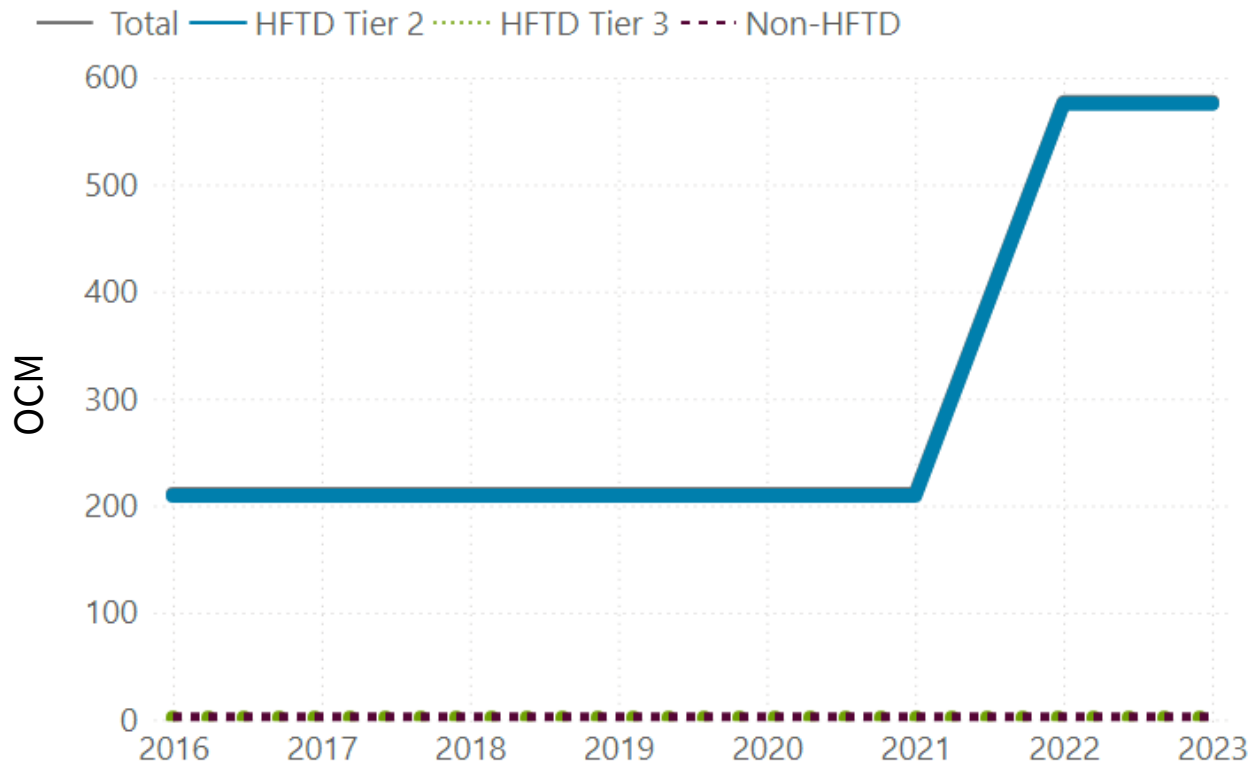
Data for this appendix comes from the QDRs as reported by BVES.⁹⁶ Note only HFTD Tier 2 data is shown as BVES has primarily only this tier in its network.

For all of the figures in this section where results are broken out by HFTD Tier, only data for HFTD Tier 2 are displayed as HFTD Tier 2 areas account for over 99% of the overall circuit mileage for BVES.

Overhead Circuit Miles

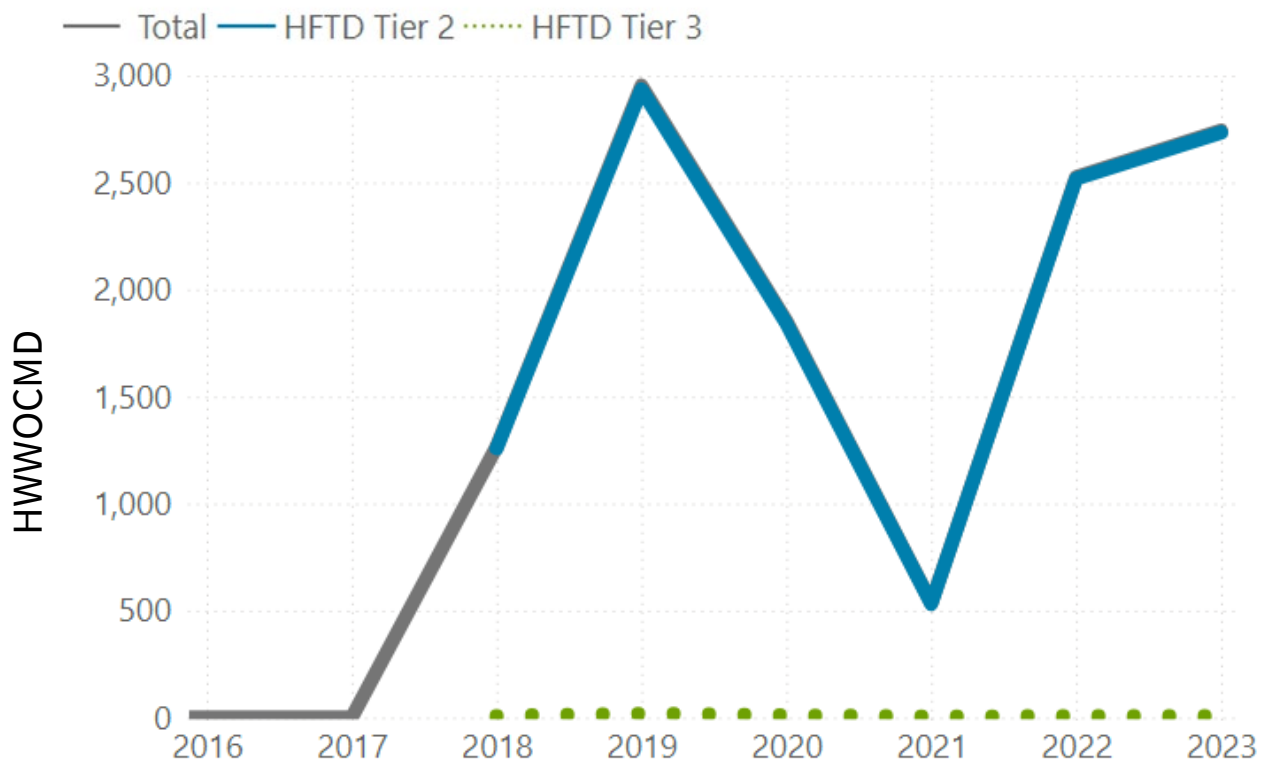
The number of overhead circuit miles (OCM) remained constant between 2016 and 2021 before increasing in 2022 (Figure 7). The increase in OCMs displayed in the figure below does not reflect a change in the actual OCM on BVES's system but instead is a result of the change in the reporting by BVES to include secondary line miles, which were not reported in prior years, in addition to only primary line miles.

⁹⁶ 2022 Q3 QDR and 2023 Q4 QDR.

Figure 7. BVES Overhead Circuit Miles (2016-2023) by HFTD Tier

High Wind Warning Overhead Circuit Mile Days

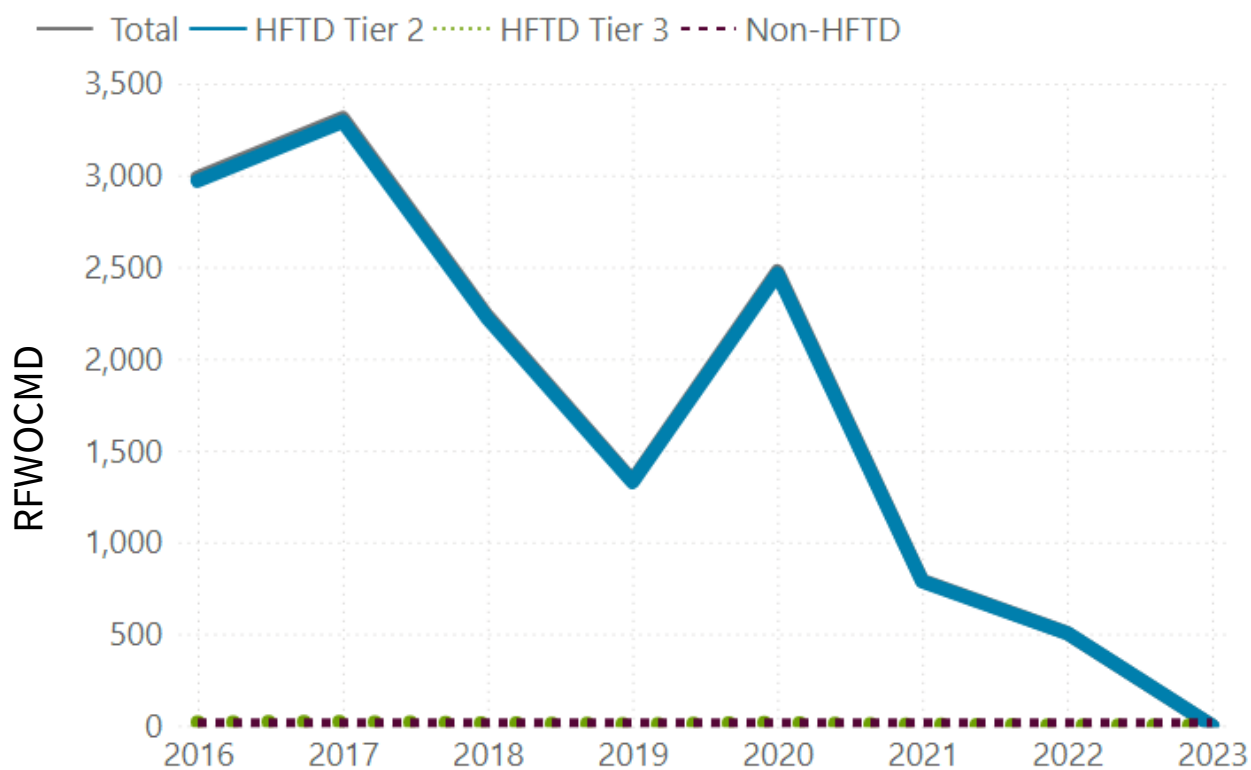
The number of high wind warning overhead circuit mile days (HWWOCMD) decreased from its highest point in 2019 through 2021, then increased from 2021 to 2023 (Figure 8). Note that the color of the line below changes due to the fact that only the total number of HWWOCMD were reported through 2017. Starting in 2018, BVES began reporting this metric by HFTD Tier.⁹⁷

Figure 8. BVES High Wind Warning Overhead Circuit Mile Days (2016-2023) by HFTD Tier

Red Flag Warning Overhead Circuit Mile Days

The number of red flag warning overhead circuit mile days (RFWOCMD) decreased from its highest point in 2017 to zero in 2023 (Figure 9).

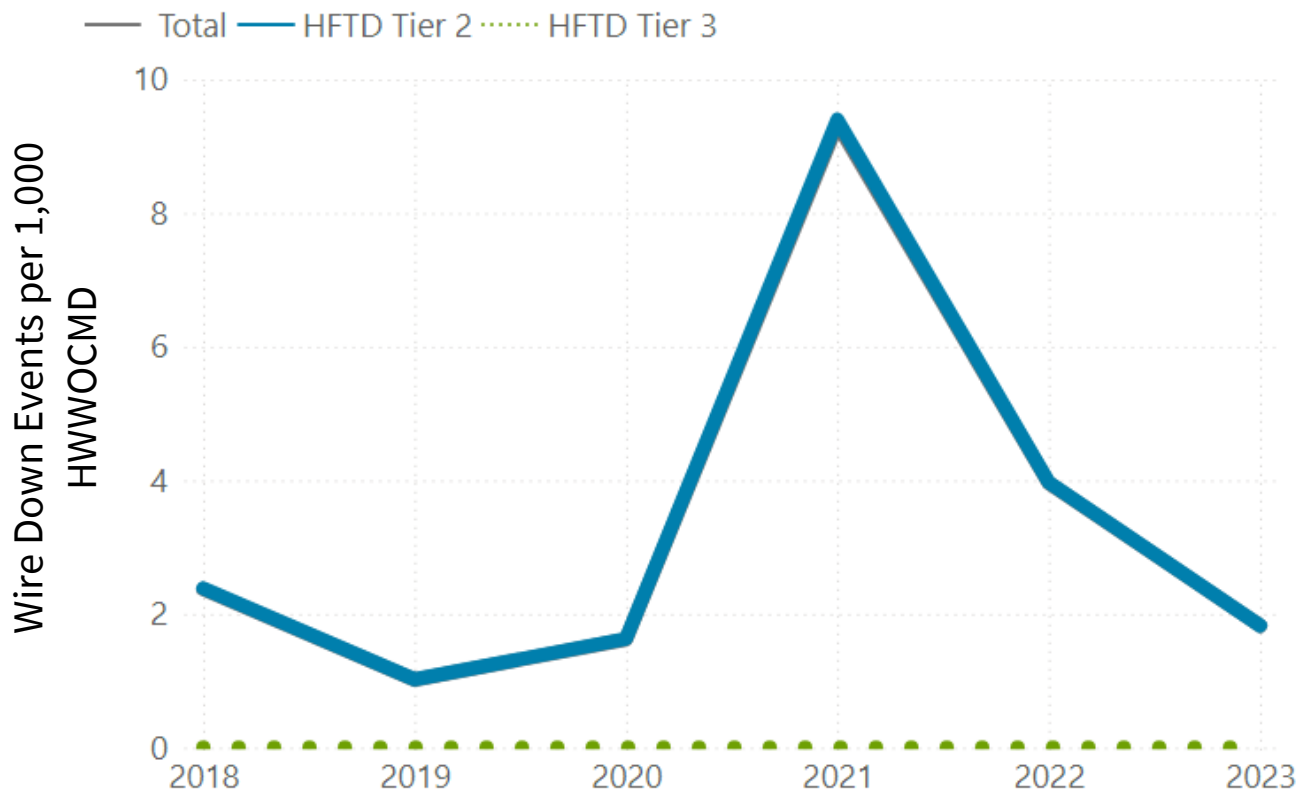
Figure 9. BVES Red Flag Warning Overhead Circuit Mile Days (2016-2023) by HFTD Tier



Wire Down Events Normalized by High Wind Warning Overhead Circuit Mile Days

When accounting for high wind conditions that may cause downed wires, the number of wire down events normalized by HWWOCMD increased from 2019 through 2022, then decreased in 2022 through 2023 (Figure 10). The figure excludes 2016 and 2017 as HWWOCMD data was not reported for HFTD Tier 2 until 2018.

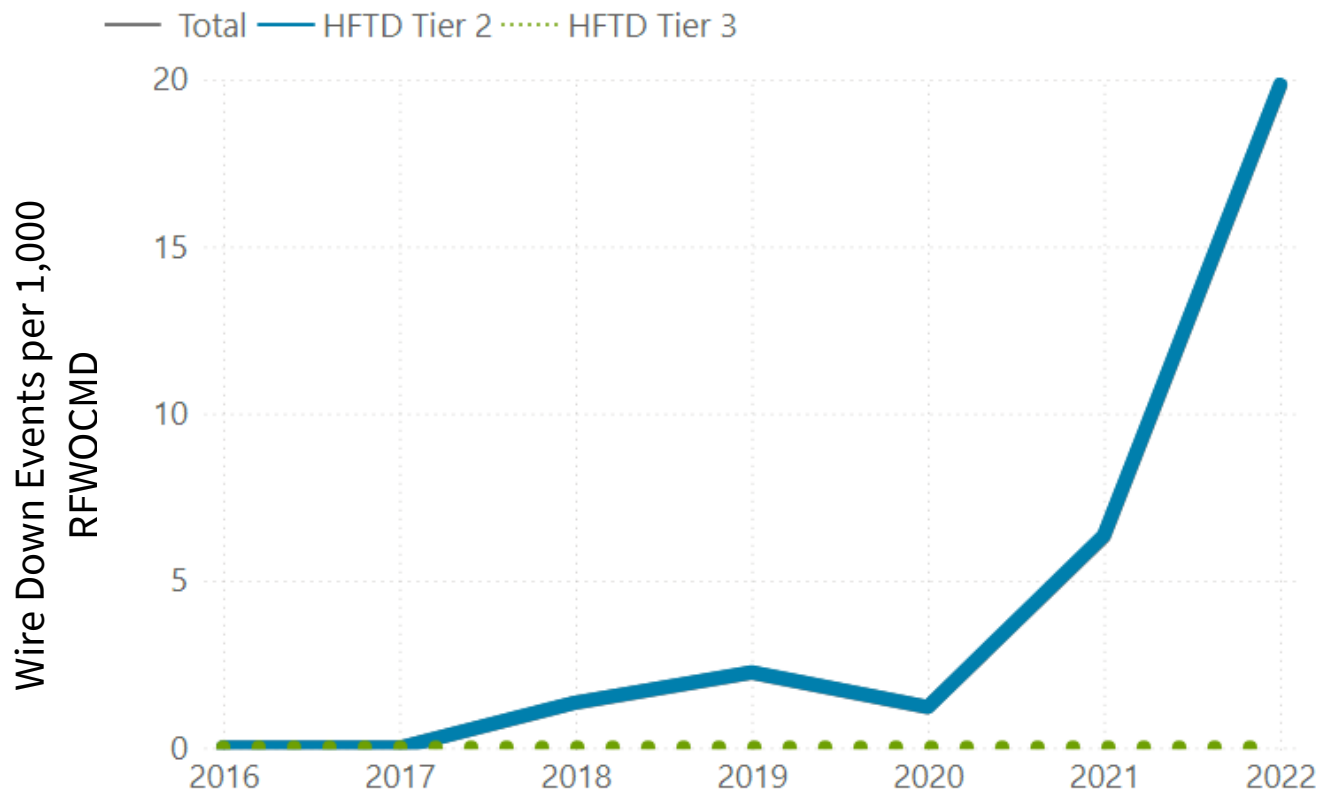
Figure 10. BVES Wire Down Events Normalized by HWWOCMD (2016-2023) by HFTD Tier



Wire Down Events Normalized by Red Flag Warning Overhead Circuit Mile Days

Wire down events normalized by RFWOCMD exhibited an increase from 2017 to 2022. There were zero RFWOCMDs in 2023, resulting in a null value for the normalized count. As a result, the figure below does not include the normalized wire down events for the year 2023 (Figure 11.).

Figure 11. BVES Wire Down Events Normalized by RFWOCMD (2016-2023) by HFTD Tier

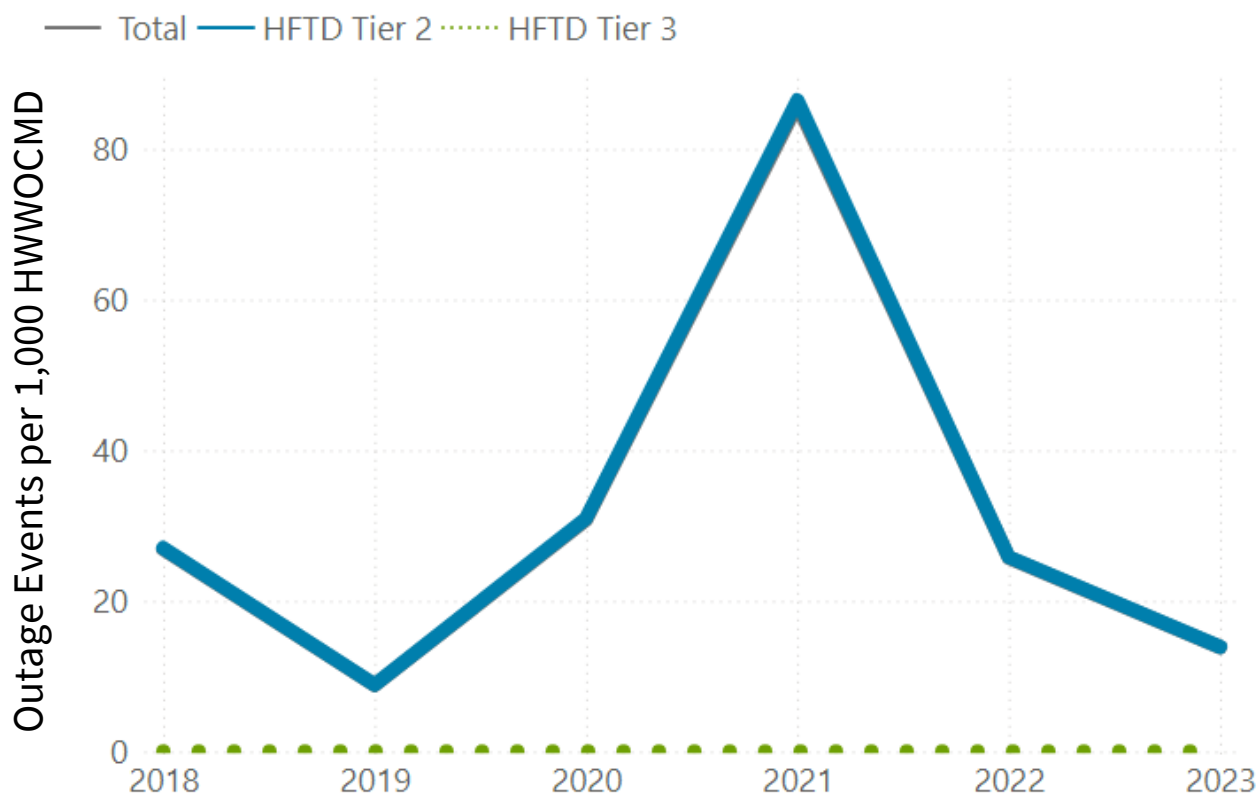


Outage Events Normalized by High Wind Warning Overhead Circuit Mile Days

To view the outage event trends with respect to year-to-year wind variations, outage event counts have been normalized by HWWOCMD.

Outage events normalized by HWWOCMD displayed an increase from 2019 to 2021, then a decrease from 2022 through 2023 (Figure 12). The figure excludes 2016 and 2017 as HWWOCMD data was not reported for HFTD Tier 2 until 2018.

Figure 12. BVES Outage Events Normalized by HWWOCMD (2016-2023) by HFTD Tier



Outage Events Normalized by Red Flag Warning Overhead Circuit Mile Days

Outage events normalized by RFWOCMD exhibited an increase from 2017 to 2022. There were zero RFWOCMDs in 2023, resulting in a null value for the normalized count. As a result, the figure below does not include the normalized outage event data for 2023 (Figure 13).

Figure 13. BVES Outage Events Normalized by RFWOCMD (2016-2023) by HFTD Tier

