



Public Advocates Office Data Request

No. CalAdvocates-BVES-2023WMP-07

Proceeding: 2023-2025 Wildfire Mitigation Plans

Date of issuance: Wednesday, May 17, 2023

Responses due: Monday, May 22, 2023

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INSTRUCTIONS

You are instructed to answer the following data request in the aforementioned proceeding, with written, accurate responses pursuant to Public Utilities Code §§ 309.5(e) and 314, Rule 1.1 of the California Public Utilities Commission's (CPUC) Rules of Practice and Procedure, and the Office of Energy Infrastructure Safety's (OEIS) guidelines for Wildfire Mitigation Plan (WMP) discovery.¹

Restate the text of each data request question prior to providing the response. Provide the name and title of the responding individual (i.e., the person responsible for the content of your answer) for each data request question. If the responding individual is not your employee, please provide their name, title, and employer, as well as the name and title of your employee who is directly responsible for the work of the responding individual.

Please send your responses and inquiries to the originators of this data request (that is, the Public Advocates Office employees and attorneys listed on the cover page), with copies to the following representatives of the Public Advocates Office:

1. CalAdvocates.WildfireDiscovery@cpuc.ca.gov
2. Henry.Burton@cpuc.ca.gov
3. Franky.Lao@cpuc.ca.gov

Requests for Clarification: If a request, definition, or instruction, is unclear, please notify the originators in writing within five business days of receipt of this data request or as soon as feasible, including a specific description of what you find unclear and why. If possible, please provide a proposal for resolving the issue. In any event, unless directed otherwise by the originators, answer the request to the fullest extent possible, explain why you are unable to answer in full, and describe the limitations of your response.

Incomplete responses: If you are unable to answer a question completely, accurately, and with the specificity requested, notify the originators as soon as possible. If possible, please provide a proposal for resolving the issue. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

Timing of responses: Please respond to each question as soon as your complete response to that specific question is available, and no later than the due date listed on the cover sheet.

Deadline extension requests: If you are unable to provide a complete response to each question by the due date noted on the cover page, contact the originators in writing to request a deadline extension. In your deadline extension request, please (1) specify the questions affected by the delay, (2) propose an alternative response date and (3) provide a written explanation as to why the deadline cannot be met. Please submit your deadline extension request as soon as feasible. To

¹ Office of Energy Infrastructure Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022, Section 8 (pp. 13-17).

comply with OEIS discovery guidelines, you must submit an extension request to the originators at least 2 business days prior to the due date.²

Objections: If you object to any portion of this data request, please submit your objections, including the specific legal basis for each objection, to the originators as soon as possible.

Response format: Responses should be provided in the original electronic format if available, and otherwise, in hard copy. (If available in Word or Excel format, send the Word or Excel document, not a PDF file.)

- All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless the use of such formats is infeasible.
- Each page should be numbered.
- If any of your answers rely on, refer to or reflect calculations that are not shown therein, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel spreadsheets or computer programs, with data and formulas intact and functioning.
- Voluminous documents produced in response to the data request should be Bates-numbered and indexed.
- Responses to the data request that refer to or incorporate documents should clearly identify the particular documents referenced, including the title and page number or, if available, Bates-numbers or Bates-range.

Other questions: For any questions, email the originators.

DEFINITIONS

- A. As used herein, the terms “you,” “your(s),” “Company,” “Bear Valley,” and “BVES” mean Bear Valley Electric Service and any and all of its respective present and former employees, agents, consultants, attorneys, and officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of this data request any information or documents which might otherwise be considered to be beyond their scope.
- C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1 through January 31” should be understood to include both the 1st of January and the 31st

² Deadline extension requests are due to OEIS at least one business day before the deadline, prior to which the electrical corporation “must first make a good-faith effort to ask the stakeholder making the request to agree to the extension.” Office of Energy Infrastructure Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022, p. 15.

of January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

- D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of this data request any information or documents which might otherwise be considered to be beyond their scope.
- E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- F. The terms “document,” “documents,” or “documentary material” include, without limitation, the following items, whether in electronic form, printed, recorded, or written or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions, orders, intra-office and interoffice communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, calendars, work papers, graphs, notebooks, notes, charts, computations, plans, drawings, sketches, computer printouts, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, bulletins, records or representations or publications of any kind (including microfilm, videotape, and records however produced or reproduced), electronic or mechanical or electrical records of any kind (including, without limitation, tapes, tape cassettes, discs, emails, and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, and discs and recordings used in automated data processing, together with the programming instructions and other material necessary to translate, understand, or use the same), and other documents or tangible things of whatever description which constitute or contain information within the scope of this data request.
- G. “Relate to,” “concern,” and similar terms and phrases shall mean to consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of this data request.
- H. “Identify”:
 - i. When used in reference to a Company employee, “identify” includes stating their full name and title.

- ii. When used in reference to a consultant or contractor for the Company, “identify” includes stating the person’s name, title, and employer, and the name and title of the Company employee who is directly responsible for the work of the consultant.
 - iii. When used in reference to a person who is not a current Company employee, consultant, or contractor, “identify” includes stating the person’s name; most recent title and supervisor at the Company; and most recent known employer, title/position, and business address;
 - iv. When used in reference to documents, “identify” includes stating the nature of the document (e.g., letter, memorandum, study), the date (if any), the title of the document, the identity of the author, and the general subject matter of the document. For documents not publicly available, please also provide the location of the document, and identify the person having possession, control or custody of the document.
- I. When requested to “state the basis” for any statement (i.e., any analysis, workpaper, study, proposal, assertion, assumption, description, quantification, or conclusion), please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, report, and analysis available to you which you believe to support the statement, or which you contend to be evidence of the truth or accuracy thereof.
- J. “CPUC” and “Commission” mean the California Public Utilities Commission.
- K. “Cal Advocates” means the Public Advocates Office.
- L. “Energy Safety” and “OEIS” mean the California Office of Energy Infrastructure Safety.
- M. “WMP” means wildfire mitigation plan. Unless otherwise specified, this refers to the 2023-2025 WMP.
- N. “Circuit segment,” “circuit-segment,” or “segment” means the shortest stretch of a circuit that can be electrically isolated – that is, a portion of a circuit with a protection device (such as a recloser) at either end. Circuit-segments are also sometimes referred to as “circuit protection zones,” “zones of protection,” or “isolatable circuit segments.”

DATA REQUEST

The following questions relate to your 2023-2025 WMP submission.

Question 1

Page 6 of your WMP states, “BVES made significant progress in migrating its many databases, which were mostly in spreadsheets, to a centralized geographic data repository. BVES engaged the support of a consultant to identify gaps and make recommendations for methods to address its Geographic Information Systems (GIS) process and to immediately update the records in the required format.”

- a) Please provide a copy of your most recent geographic data repository in .gdb format.
- b) Please list the gaps that the consultant identified, noted above.
- c) Please list the recommendations made by the consultant to address the gaps listed in part (b).
- d) If the consultant submitted a written report or analysis to BVES, please provide a copy of it.

Question 2

Table 4-1 on page 22-23 of your WMP lists your actual and forecast total WMP expenditures for 2020 through 2026.

- a) Please explain the large increase between your 2023 forecast (\$17.673 million) and your 2024 forecast (\$35.081 million). As part of this explanation, describe whether any programs will dramatically increase in scope or unit cost in 2024, and list any new programs that will be initiated in 2024.
- b) Please explain why your 2025 forecast (\$8.948 million) is substantially lower than your 2023 and 2024 forecasts. As part of this explanation, describe whether any programs will dramatically decrease in scope or unit cost in 2025, and list any programs that will be concluded prior to 2025.
- c) Please provide a version of Table 4-1 that disaggregates each year’s total spending into program areas, including at least the following categories:
 - i. Risk assessment and modeling
 - ii. Grid design and system hardening
 - iii. Asset management and inspections
 - iv. Vegetation management and inspections
 - v. Situational awareness and forecasting
 - vi. Other spending

Question 3

Page 48 of your WMP states, “Initial WRRM results became available to BVES in late February 2023.”

- a) Please describe the initial WRRM results that were provided to BVES in February.
- b) What was the format or formats of the initial WRRM results provided to BVES?
- c) Please provide a copy of the initial WRRM results that were provided to BVES in February. If any portion of this requires a specialized program to view (e.g., proprietary Technosylva software), please also list the type of program(s) required.

Question 4

The narrative for section 6.2.1 appears to begin on page 58 of your WMP with the following:

and in Section 6.1.1 illustrate BVES’s overall utility risk assessment framework. BVES’s overall risk is comprised of the risk stemming from both wildfire and PSPS events across its service territory. This includes several likelihood and consequence risk components that are aggregated based on the framework shown in . The following paragraphs define each risk component.

This paragraph appears to be missing text at the beginning, and appears to be missing a referenced table or figure in the second-to-last sentence. If this is the case, please provide an updated version of section 6.2.1.

Question 5

Table 6-5 on page 84 of your WMP lists the risk ranking for your circuits. The risk ranking does not appear to correlate to the overall risk score. For example, the Boulder circuit has the lowest overall risk score (882.12) but its risk ranking is 4.

- a) Please state how the risk ranking in this table is determined.
- b) Please explain why the Boulder Circuit has a high risk ranking despite its low overall risk score.

Question 6

The supporting table of your response to data request CalAdvocates-BVES-2023WMP-03, question 1, shows that the SAIDI and SAIFI was higher in 2022 compared to 2021 for 19 of your 26 circuits.

- a) Please explain, to the best of your current knowledge, why SAIDI was higher in 2022 compared to 2021 for the majority of your circuits.
- b) Please explain, to the best of your current knowledge, why SAIFI was higher in 2022 compared to 2021 for the majority of your circuits.

Question 7

The supporting table of your response to data request CalAdvocates-BVES-2023WMP-03, question 1, shows a “1” or “0” for all rows under “number of detailed overhead inspections.”

- a) Does a “1” indicate that *all* poles or assets in that circuit underwent a detailed inspection in that year?
- b) If the answer to part (a) is no, please explain what a “1” indicates.
- c) Does BVES record a unique detailed inspection record each time a pole or asset is inspected?
- d) If the answer to part (c) is yes, please explain why a maximum of 1 detailed inspection is recorded for each circuit.
- e) If the answer to part (c) is no, please explain why BVES does not record a detailed inspection record each time a pole or asset is inspected.

Question 8

- a) Please explain the differences in BVES’ methods between a patrol inspection of a circuit and a detailed inspection of a circuit.
- b) Please describe what records or reports BVES creates when it conducts a patrol inspection.
- c) Please describe what records or reports BVES creates when it conducts a detailed inspection.

Question 9

Attachment 1 of your response to CalAdvocates-BVES-2023WMP-05 states, “BVES cross-checks detailed inspection findings with findings from other inspections (patrol, 3rd party, UAV, LiDAR) to verify quality.”

- a) What percentage of detailed inspections does BVES cross check with other inspections in this manner?
- b) How many such cross-checks did BVES perform in 2022?
- c) Please describe the process for the cross-checks described above.
- d) How does BVES record the findings or results of these cross-checks?
- e) If a cross-check suggests that the detailed inspection missed or incorrectly classified an issue, how does BVES resolve this discrepancy?
- f) Please provide records of the cross-checks described above that were performed in 2022. If this would result in more than 25 documents, please provide a sample of 25 records of cross-checks performed in 2022.

Question 10

The Excel file for your response to CalAdvocates-BVES-2023WMP-05, question 4, includes the following two work orders related to poles:

10216BV_20220728104533, “cracked pole top,” opened 7/28/2022, due 7/28/2023

8180BV_20220804083125, “pole top split,” opened 8/4/2022, due 8/4/2027

- a) Please explain the difference between these two defect types.
- b) Please explain why the first work order has a due date of 7/28/2023, one year after the work order was opened.
- c) Please explain why the second work order has a due date of 8/4/2027, five years after the work order was opened.

Question 11

Attachment 1 of your response to CalAdvocates-BVES-2023WMP-06 lists the actual and forecast costs and mileage of covered conductor installation from 2022 through 2024. Dividing cost by mileage provides the following unit costs:

2022 (actual): \$740,000/mile

2023 (forecast): \$530,000/mile

2024 (forecast): \$530,000/mile

- a) Please state the basis for the forecast decrease in the unit cost of covered conductor from 2022 to 2023.
- b) Does either the 2023 forecast or the 2024 forecast include the costs of the Radford line covered conductor project? Please explain your response.

Question 12

- a) What is your forecast total cost for the Radford line covered conductor project?
- b) What is your forecast unit cost (per circuit mile of covered conductor installed) for the Radford line covered conductor project?

END OF REQUEST