



Public Advocates Office Data Request

No. CalAdvocates-BVES-2023WMP-06

Proceeding: 2023-2025 Wildfire Mitigation Plans

Date of issuance: Wednesday, February 22, 2023

Responses due: Wednesday, April 19, 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

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 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

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

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

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 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.”
 - O. “HFTD” means High Fire-Threat District as defined in CPUC General Order 95, Section II, item 21.2(D), and CPUC Decision 17.01.009 (pp. 39-40; Ordering Paragraphs 1 and 1(mm)) (“Fire Map 2”).³ This term encompasses three areas:
 - a. Tree Mortality High Hazard Zone (HHZ) 1 on the U.S. Forest Service - CAL FIRE joint map of Tree Mortality HHZs (see D.17-01-009, pp. 39-40).
 - b. HFTD Tier 2, the elevated wildfire risk area included in Shape C map of the CPUC Fire-Threat Map (“Fire Map 2”) that was adopted in D.17.01.009, pp. 39-40; and
 - c. HFTD Tier 3, the extreme wildfire risk area included in Shape C map of the CPUC Fire-Threat Map (“Fire Map 2”) that was adopted in D.17.01.009, pp. 39-40.

³ As modified by Commission Decision 20-12-030.

- P. “Non-HFTD” means areas that are not designated as HFTD according to the definition above.
- Q. “Tier 2” means HFTD Tier 2, as defined in D.17.01.009, pp. 25, 39-40 and Ordering Paragraph 1(v).
- R. “Tier 3” means HFTD Tier 3, as defined in D.17.01.009, pp. 25, 39-40 and Ordering Paragraph 1(v).
- S. “Other HFTD” means areas *outside of Tier 2 and Tier 3* that are designated as HFTD because they are included in Tree Mortality High Hazard Zone 1.
- T. “Fast-trip settings” are settings on grid protective devices that are intended to rapidly de-energize a circuit or a portion of a circuit once a fault occurs. Fast-trip settings are also sometimes referred to as fast curve settings, Enhanced Powerline Safety Settings, and sensitive relay settings.
- U. “VM” means Vegetation Management.
- V. “LiDAR” means light detection and ranging technology.
- W. “PSPS” means Public Safety Power Shutoff.

DATA REQUEST

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

If a full response to a given question will be included in your WMP submission, your response to that question of this data request may consist of a citation to the specific page(s) or table(s) of the WMP where the information may be found, a written response to the question, or both.

Vegetation Management

Question 1

Page E-11 of BVES’s 2022 WMP Update described the Annual VM Program Audit, which is conducted in January of each year. Please provide all documentation associated with the January 2023 Annual VM Program Audit.

Question 2

Page E-11 of BVES’s 2022 WMP Update described the Quarterly VM Program Assessment. Please provide all documentation associated with the Quarterly VM Program Assessments covering each of the following periods:

- a) Q1 of 2022
- b) Q2 of 2022
- c) Q3 of 2022
- d) Q4 of 2022.

Question 3

Please provide a list of any incidents in 2022 where the actions of a VM contractor posed a safety risk to workers and/or the public. "Safety risk" here is defined as any occurrence on a worksite where the contractor's behavior created a safety hazard for either workers or the general public.

For each instance, please provide:

- a) The date you were informed of the safety issue
- b) The date that the original work that created the safety issue was performed
- c) The voltage of the circuit(s) associated with the safety issue
- d) The vegetation management initiative involved in the original work
- e) A brief description of the safety issue involved.

System Hardening

Question 4

Provide your workplan that describes where and when you will perform system hardening in 2023. For projects that you expect to partially complete in 2023 (i.e. projects that started before 2023 and are expected to continue in 2023, or projects that are expected to be completed after 2023), please include the project and report the work that you forecast will actually be performed in calendar year 2023.

For each project, include the following information in separate columns, at a minimum:

- a) Order or job number
- b) Program
- c) Circuit ID number
- d) Circuit-segment name or ID number (if the project affects more than one circuit-segment, please identify each one)
- e) Relevant wildfire risk score(s) from the wildfire risk model that you are using to estimate distribution risk in your 2023-2025 WMP filing
- f) The expected or actual start date of the project
- g) The expected completion date of the project
- h) Length (in circuit miles) of covered conductor to be installed in 2023
- i) Length (in circuit miles) of underground conductor to be installed in 2023
- j) Length (in circuit miles) of overhead conductor to be permanently removed in 2023 and replaced by underground conductor (note that this may differ slightly from the previous part due to differing overhead and underground routes).

- k) Length (in circuit miles) of overhead conductor to be permanently removed in 2023 and *not replaced* with covered conductor or underground conductor
- l) Length (in circuit miles) of any other type of system hardening project to be installed in 2023 (if this is greater than zero, please describe the type of system hardening project).

Question 5

Provide your workplan that describes where and when you will perform system hardening in 2024. For projects that you expect to partially complete in 2024 (i.e. projects that are expected to start before 2024 and are expected to continue in 2024, or projects that are expected to be completed after 2024), please include the project and report the work that you forecast will actually be performed in calendar year 2024.

For each project, include the following information in separate columns, at a minimum:

- a) Order number
- b) Program
- c) Circuit ID number
- d) Circuit-segment name or ID number (if the project affects more than one circuit-segment, please identify each one)
- e) Relevant wildfire risk score(s) from the wildfire risk model that you are using to estimate distribution risk in your 2023-2025 WMP filing
- f) The expected or actual start date of the project
- g) The expected completion date of the project
- h) Length (in circuit miles) of covered conductor to be installed in 2024
- i) Length (in circuit miles) of underground conductor to be installed in 2024
- j) Length (in circuit miles) of overhead conductor to be permanently removed in 2024 and replaced by underground conductor (note that this may differ slightly from the previous part due to differing overhead and underground routes)
- k) Length (in circuit miles) of overhead conductor to be permanently removed in 2024 and *not replaced* with covered conductor or underground conductor
- l) Length (in circuit miles) of any other type of system hardening project to be installed in 2024 (if this is greater than zero, please describe the type of system hardening project).

Question 6

For each of your 2023-2025 WMP system hardening initiatives, please provide disaggregated information related to expenditures and circuit miles treated in the attached table, CalAdvocates-BVES-2023WMP-06 Attachment 1. Add columns as needed. **Note:** for the purposes of this

question, “line removal” refers to conductors that are permanently removed without replacement – for instance, as part of a remote grid project. This should be understood as identical to part (k) of questions 4 and 5 above.

Question 7

For the Radford Line Covered Conductor Project, please state the month and year that BVES *completed or currently plans to complete*:

- a) Project planning
- b) Design and engineering
- c) Permitting
- d) Construction.

Question 8

If the Radford Line Covered Conductor Project was not completed in 2022, please answer the following:

- a) Please list all factors that have contributed to the deferral of the Radford Line Covered Conductor Project from completion in 2022.
- b) For each factor listed in response to part (a), please describe the actions BVES has taken to mitigate these factors and prevent the project from being deferred later than 2023.
- c) Please list any factors that BVES anticipates may cause the *completion* of the Radford Line Covered Project to be deferred until later than 2023.
- d) For each factor listed in response to part (c), please list the actions BVES has taken to mitigate these factors and prevent the project’s completion from being deferred beyond 2023.

PSPS

Question 9

Table 4-4 (pp. B-19 and B-20) of BVES’s 2022 WMP Update lists the PSPS-related operations BVES will take under various conditions. **Please provide the following information (1-4) for each question part below (a-i), if applicable. (If there were no days that fit the description, please state “none” for that question part.)**

1. the date
 2. the maximum wind speed observed on that day
 3. The National Fire Danger Rating System (NFDRS) rating
 4. whether any damage to BVES assets was found following the high wind conditions.
- a) Days in 2022 when, in accordance with Table 4-4, BVES deployed Wildfire Risk Teams to “high risk” areas

- b) Days in 2022 when, in accordance with Table 4-4, BVES forwarded to Field Operations an updated list of medical baseline customers and access and functional needs population
- c) Days in 2022 when, in accordance with Table 4-4, BVES activated the Emergency Operations Center
- d) Days in 2022 when, in accordance with Table 4-4, BVES prepared the Bear Valley Power Plant for sustained operations
- e) Days in 2022 when, in accordance with Table 4-4, BVES conducted switching operations to minimize the impact of potential PSPS activity
- f) Days in 2022 when, in accordance with Table 4-4, BVES activated first responder, local government and agency, customer and community, or stakeholder PSPS communications plans
- g) Days in 2022 when, in accordance with Table 4-4, BVES activated Community Resource Centers
- h) Days in 2022 when BVES considered itself on “PSPS Watch” because it would be necessary for BVES to initiate a PSPS event if conditions worsened
- i) Days in 2022 when BVES considered itself on “PSPS Watch” because Southern California Edison would need to initiate a PSPS event on one or more BVES supply lines if conditions worsened.

Question 10

Regarding your PSPS circuit modeling capabilities:

- a) Please describe your present circuit modeling capabilities with regard to PSPS decision-making (“PSPS circuit modeling capabilities”), including with what level of granularity they are able to determine how circuit hardening efforts or other changes to a line segment will affect PSPS thresholds.
- b) Please describe any improvements to the present PSPS circuit modeling capabilities that you expect to implement in 2023.
- c) Please describe any improvements to the present PSPS circuit modeling capabilities that you expect to implement in 2024.
- d) Please describe the expected state of your PSPS circuit modeling capabilities at the conclusion of the 2023-2025 WMP cycle.

END OF REQUEST