DATA REQUEST RESPONSE
Bear Valley Electric Service, Inc.

Response provided by:	Jon Pecchia
Title:	Utility Manager
Data Request Number:	No. CalAdvocates-BVES-2022 WMP-08
Date Received:	May 31, 2022
Date Due:	June 3, 2022
Date Provided:	June 3, 2022

DATA REQUESTS
The following questions relate to your 2022 WMP Update submission.

Question 1
Page A-28 of BVES's 2022 WMP Update states that, in the event that SCE initiates a PSPS on supply lines to BVES, "BVES would seek to supply power to its customers using all available resources, which include the Bear Valley Power Plant (BVPP) generating 8.4MW of local power that would supply critical facilities and the majority of the service area."

a) If all supply lines from SCE are de-energized, would the BVPP be capable of supplying power full-time (i.e. no rolling blackouts) to all critical facilities?

Respons**e:** No.

b) If the answer to part (a) is no, please describe the limitations that would prevent this.

Response: The capacity of the BVPP is 8.4 MW. This is below the typical load that BVES serves. Therefore, BVES would be required to interrupt interruptible customers, ask customers to scale back consumption and would need to implement rolling blackouts.

Question 2
P**age A-28 of BVES's 2022 WMP Update states that, in the event that SCE initiates a PSPS on supply lines to BVES, "BVES would seek to supply power to its customers using all available resources, which include the Bear Valley Power Plant (BVPP) generating 8.4MW of local power that would supply critical facilities and the majority of the service area."**

a) If all supply lines from SCE are de-energized, would the BVPP be capable of supplying power full-time (i.e. no rolling blackouts) to all AFN customers and medical baseline customers, *in addition to* all critical facilities?

Response: No.

b) If the answer to part (a) is no, please describe the limitations that would prevent this.

Response: BVES would supply power to critical facilities, but it would be difficult if not impossible to supply power to all medical baseline and AFN customers because they are more or less homogeneously dispersed on BVES's distribution circuits. Therefore, some medical baseline and AFN customers would be affected by rolling blackouts. BVES has a limited amount of battery backup unit that may be deployed on a first-come, first-served basis.

Question 3
Pages 168-169 of BVES's 2022 WMP Update discuss the Bear Valley Energy Storage Facility and the Bear Valley Solar Energy Project. Page 169 states, "One of the purposes of the storage project is to minimize the impact of the loss of all SCE energy imports to the BVES service area due to a SCE-directed PSPS of the SCE supply lines to BVES."

a) Does BVES anticipate any other uses for the energy storage project referenced above, beyond minimizing the impact of the loss of all SCE energy imports?

Response: Yes.

b) If the answer to part (a) is yes, please describe all such purposes.

Response: Benefits include energy savings by procuring energy during daylight and discharging in evening, resource adequacy reduction, improved grid reliability, improved power quality (voltage and frequency), eliminates any plausible black start scenario for power plant, and improves capacity for when Snow Summit shifts to procuring BVES power for snowmaking instead of operating its diesel generators (self-generation).

c) What is the expected total capital cost of the Bear Valley Solar Energy Project? This should include costs such as planning, design, permitting, construction, but should exclude ongoing operating costs of the facility.

Response**:** The estimated total capital cost is approximately $15,200,000. However, this cost could decrease if BVES is able to tie this project to qualify for certain investment tax credits (ITC).

d) What is the expected total capital cost of the Bear Valley Energy Storage Facility? This should include costs such as planning, design, permitting, construction, but should exclude ongoing operating costs of the facility.

Response: The estimated total capital cost is approximately $12,500,000. However, this cost could decrease if BVES is able to tie this project to developing a solar generating facility, which would make it eligible for certain investment tax credits (ITC). BVES is working on developing solar project.

Question 4
Page 74 of BVES's 2022 WMP Update states, "To date, due to privacy issues, BVES has been unable to collect comprehensive data on AFN populations, but BVES is still pursuing its efforts."
a) When does BVES anticipate having comprehensive data on AFN populations?

Response: Currently, BVES has identified 385 AFN customers.

b) Please describe the actions BVES took in 2021 to collect comprehensive data on AFN populations.

Response: BVES developed an on-line self-registration form and information page to help identify AFN customers https://www.bvesinc.com/customer-service/assistance-programs/access-&-functional-needs/ . BVES continues to reach its AFN population through direct customer contact, social media and direct mail campaigns.

c) Please describe the efforts BVES plans to undertake to collect comprehensive data on AFN populations in 2022.

Response: BVES continues with its direct customer contact and mail campaigns, social media advertising, website development and is releasing a new AFN identification survey with prepaid postage to further encourage participation.

Question 5
Page E-11 of BVES's 2022 WMP Update describes the Annual VM Program Audit, which is conducted in January of each year. Please provide all documentation associated with the January 2022 Annual VM Program Audit.

Response: Please refer to attachment titled "2021 VM Audit" (or "Vegetation Management Program Annual Audit 2021")

Question 6
Page E-11 of BVES's 2022 WMP Update describes 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 2021.

Response: No record is available for Vegetation Management Quarterly Update Q1 2021. This report began in Q2 of 2021.

b) Q2 of 2021.

Response: Please refer to attachment titled "Vegetation Management Quarterly Update Q2 2021". Also refer to Trim Map 2022 Q1 report for grid locations.

c) Q3 of 2021.

Response: Please refer to attachment titled "Vegetation Management Quarterly Update Q3 2021." Also refer to Trim Map 2021 Q3 report for grid locations.

d) Q4 of 2021.

Response: Please refer to attachment titled "Vegetation Management Quarterly Update Q4 2021". Also refer as Trim Map 2021 Q4 report for grid locations.

e) Q1 of 2022.

Response: Please refer to attachment titled "Vegetation Management Quarterly Update Q1 2022". Also refer to Trim Map 2022 Q1 report for grid locations.

Question 7
Page F-6 of BVES's 2022 WMP Update states, as step 12 of the BVES Quality Assurance process, that BVES will "Evaluate results of in process QC." Step 13 states that BVES will "Determine if corrective action and/or process improvements warranted based on in process QC."
In response to data request CalAdvocates-BVES-2022WMP-04, question 1, BVES provided a document titled "2022 Q1 Patrol Inspections."

a) Please describe how BVES evaluated the results of "2022 Q1 Patrol Inspections" per step 12 listed above.

Response: Any patrol inspection findings are validated and recorded. Priorities are determined for any corrective action needed.

b) Please provide documentation showing that the results of in-process QC associated with "2022 Q1 Patrol Inspections" were evaluated, per step 12 listed above.

Response: No Level 1 or Level 2 corrective actions were documented in 2022 Q1 patrol inspections.

c) Please describe the corrective actions or process improvements that BVES found to be warranted based on "2022 Q1 Patrol Inspections."

Response: The process is periodically reviewed by the Utility Engineer & Wildfire Mitigation Supervisor to determine if any process improvement are warranted.

d) Please provide documentation showing whether the in-process QC associated with "2022 Q1 Patrol Inspections" resulted in any corrective actions, per step 13 listed above.

Response: No changes were found to be warranted for this process in Q1 2022.

Question 8
Data request CalAdvocates-BVES-2022WMP-02, question 1, requested internal QA/QC reports completed in 2021. As part of its response, BVES provided a zip file titled "2021 Circuit Patrol Records." The pdf documents in the zip file appear to be inspection records, but do not include the results of the inspections.
Please provide additional documentation showing the results/findings of the inspections included in the zip file titled "2021 Circuit Patrol Records."

Response: Please refer to attachment titled "2021 Detailed Patrol Inspections"

Question 9
Data request CalAdvocates-BVES-2022WMP-02, question 1, requested internal QA/QC reports completed in 2021. As part of its response, BVES provided a zip file titled "2021 Circuit Patrol Records." The pdf documents in the zip file appear to be inspection records. However, it is unclear whether these are records of the patrol inspections, or of QA/QC inspections.

a) Are the pdf documents discussed above records of circuit patrol inspections performed in accordance with GO 165, or records of circuit patrol QA/QC inspections?

Response: The circuit patrol inspections were performed in accordance with GO 165.

b) If the pdfs referenced above are not QA/QC inspections, please provide documentation of all QA/QC inspections associated with BVES's 2021 patrol inspections. Please include documentation showing that the QC results were evaluated, and that corrective actions (if any) were taken.

Response: No independent QA/QC field inspections were performed on the BVES's 2021 patrol inspections

c) If the pdfs referenced above are QA/QC inspections, please provide documentation showing that the QC results were evaluated, and that corrective actions (if any) were taken.

Response: N/A

Question 10
Data request CalAdvocates-BVES-2022WMP-02, question 1, requested internal QA/QC reports completed in 2021. As part of its response, BVES provided a pdf titled "2021 Substation Vegetation Management." The forms included in this pdf document are all dated 2020. Additionally, it is unclear whether these are records of the substation inspections, or of QA/QC inspections.

a) Please provide similar records (to those contained in the pdf titled "2021 Substation Vegetation Management") from calendar year 2021.

Response: : Please refer to attachment titled "2021 VM Audit" (or "Vegetation Management Program Annual Audit 2021"

b) Are the forms included in the pdf discussed above records of substation vegetation management inspections performed in accordance with GO 174, or of substation vegetation management QA/QC inspections?

Response: The substation vegetation management inspections performed in accordance with GO 174.

c) Please provide documentation of the QA/QC inspections associated with BVES's 2021 substation inspections. Please include documentation showing that the QC results were evaluated, and that corrective actions (if any) were taken.

Response: No independent QA/QC field inspections were performed.

Question 11
In response to data request CalAdvocates-BVES-2022WMP-02, question 1, BVES stated that all substations are inspected on a monthly basis. BVES additionally stated that it has thirteen substations, and conducted 144 inspections in 2021.
Thirteen substations inspected monthly should result in 156 inspections throughout the year. Please explain this apparent discrepancy.

Response: BVES inspects each in service substation monthly. The Palomino Substation was out of service for two months in 2021. : Please refer to attachment titled "2021 VM Audit" (or "Vegetation Management Program Annual Audit 2021"

Question 12
Data request CalAdvocates-BVES-2022WMP-02, question 1, requested internal QA/QC reports completed in 2021. BVES's responses do not appear to indicate that detailed asset inspections underwent QA/QC in 2021.
a) Did BVES perform QA/QC for detailed asset inspections in 2021?

Response: Yes, Detailed inspections were conducted on the Fox Farm, Sunrise, Sunset and Radford circuits.

b) If the answer to part (a) is yes, please describe the QA/QC actions that BVES performed for detailed asset inspections in 2021.

Response: Detailed inspections were conducted in accordance with GO165. No additional field QA/QC inspections were conducted.

c) If the answer to part (a) is yes, please provide documentation of the QA/QC inspections for detailed asset inspections in 2021. Please include documentation showing that the QC results were evaluated, and that corrective actions (if any) were taken.

Response: Please refer to attachment titled "2021 Patrol Inspections"

d) If the answer to part (a) is no, please explain why not.

Response: N/A

Question 13
Page 188 of BVES's 2022 WMP Update states, for initiative 7.3.4.13 (Pole loading assessment program to determine safety factor), that "the utility plans to continue this project in high-risk areas and achieve 100 percent completion in 2022."
Page 146 of BVES's Revised 2021 WMP Update states that the same program will be complete by end of calendar year 2026.

a) Please explain the apparent discrepancy in forecast completion date of the pole loading assessment program discussed above.

Response: BVES is merging the Pole Loading Program with the Covered Conductor Program. In 2022, BVES is using the Pole Loading Program to replace/remediate poles that were identified as failing assessment in the past. The program is also assessing poles that will be required to support covered conductors as part of the ongoing covered conductors program.

The covered conductor program takes longer to execute and, therefore, the assessment rate of poles has slowed down so not to get too far ahead of the covered conductor program.

b) What is BVES's current expected completion date for the pole loading assessment program?

Response: BVES will close out the Pole Loading Program at the end of 2022 and will assess poles in coordination with the covered conductor program thereafter. The covered conductor program is expected to be completed on the 34.5 kV system in 2025/2026 and on the 4 kV system high risk areas in 2032.

Question 14
In non-spatial data Table 12 (as well as page 188) of BVES's 2022 WMP Update, the 2021 and 2022 costs associated with initiative 7.3.4.13 (Pole loading assessment program to determine safety factor) appear to be all CAPEX.
Please explain why the costs associated with this program are shown as CAPEX.

Response: The pole assessments were performed in conjunction with the covered conductor program and pole loading program, which are CAPEX programs. Poles assessed under the pole replacements were assessed to the specification that they would eventually be required to sustain covered conductor (more limiting) so that duplicate work was not performed and the process would be more efficient.

Question 15
For the following initiatives, on average, how many inspections were performed per circuit mile in 2021?
a) Initiative 7.3.4.1, detailed inspections of distribution electric lines and equipment.

Response: BVES grid structure has an average of 30 to 35 poles per circuit mile. Many poles contain both 34kV and 4kV lines. All poles and distribution lines are inspected.

b) Initiative 7.3.4.11, patrol inspections of distribution electric lines and equipment.

Response: BVES grid structure has an average of 30 to 35 poles per circuit mile. Many poles contain both 34KV and 4KV lines. All poles and distribution lines are inspected.

c) Initiative 7.3.4.9.1, Third party (second) ground patrol – detailed inspection program.

Response: BVES grid structure has an average of 30 to 35 poles per circuit mile. Many poles contain both 34kV and 4kV lines. All poles and distribution lines are inspected.

Question 16
For the following initiatives, on average, how many person-hours did it take to complete one inspection in 2021?
a) Initiative 7.3.4.1, detailed inspections of distribution electric lines and equipment.

Response: Inspection time varies greatly depending on the circuit being evaluated. The number of poles in a circuit varies from less than 10 to over 1,000. BVES does not record the exact time the full-time Field Inspector (BVES has only 1inspecor) spends each type of inspection being conducted (patrol or detailed) but a good estimate is 30% on detailed inspections and 70% on patrol inspections.

b) Initiative 7.3.4.11, patrol inspections of distribution electric lines and equipment.

Response: Inspection time vary greatly depending on the circuit being evaluated. The number of poles in a circuit vary from less than 10 to over 1000. BVES does not record the exact time the full-time Field Inspector (BVES has only 1) spends each type of inspection being conducted (patrol or detailed) but a good estimate is 30% on detailed inspections and 70% on patrol inspections.

c) Initiative 7.3.4.9.1, Third party (second) ground patrol – detailed inspection program.

Response: BVES contractor spent approximately 360 hours on third party ground patrol inspections in 2021.

Question 17
Page 177 of BVES's 2022 WMP Update states that BVES spent $8,177.86 (OPEX) in 2021 on initiative 7.3.4.1 (Detailed inspections of distribution electric lines and equipment). In 2022, BVES projects spending $8,400 (OPEX).
a) Do the operating expenses detailed above include travel time to and from the inspection sites?

Response: BVES service area is 32 square miles and if one subtracts out the Big Bear Lake and the dry lakes (Baldwin Lake and Lake Williams) it is approximately 25 square miles. Therefore, travel time is not a significant factor. Trying to separate out time to an inspection and back would not be practical.

b) Please list all activities covered under the operating expenses discussed above, other than the actual time spent performing the inspections while on-site.

Response: In addition to conducting the inspection, the inspector must document the results of the inspection. Also, so minor immediately correctible discrepancies are performed by the Field Inspector. For example, missing vis-strips and down guy guards may be repaired on the spot.

c) Are costs associated with detailed asset inspections captured under any line in Table 12 of your 2022 WMP other than initiative 7.3.4.1? If so, please list each line that contains these costs.

Response: Line 7.3.5.2. (Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment) included costs of detailed vegetation inspections. The detailed asset and vegetation inspections are performed at the same time by the Field Inspector. The cost is divided equally as it is not practical to determine the exact time focused on vegetation issues and asset condition issues.

END OF REQUEST