

**BEFORE THE CALIFORNIA PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

Rulemaking 18-10-007
(filed October 25, 2018)

**BEAR VALLEY ELECTRIC SERVICE, INC. (U 913 E) REPLY TO COMMENTS OF
THE PUBLIC ADVOCATES OFFICE ON THE 2021 WILDFIRE MITIGATION PLAN
UPDATES OF THE SMALL AND MULTI-JURISDICTIONAL ELECTRIC UTILITIES**

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I. INTRODUCTION

Pursuant to the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Wildfire Safety Division (“WSD”), and guidance in Resolution WSD-011, Bear Valley Electric Service, Inc. (“BVES” or “Bear Valley”) submits its Reply Comments. These comments respond to the April 14, 2021 recommendations made by Public Advocates Office (“Cal Advocates”) and Green Power Institute (“GPI”) to WSD regarding Bear Valley’s 2021 Wildfire Mitigation Plan (“WMP” or “Plan”).

II. COMPLIANCE

In Opening Comments, Cal Advocates and GPI makes recommendations on issues for the WSD to consider. BVES addresses these recommendations below:

1. Internal Audit and QA/QC Procedures and Future WMP Guidelines

- a. Cal Advocates recommends that the WSD should require BVES to expand on quality assurance and quality check (“QA/QC”) programs and accelerate implementation for asset inspections within its 2022 WMP Update.*

Bear Valley does not oppose Cal Advocates' recommendation. However, BVES notes that this effort will require BVES accelerate the use of additional contracted services to implement the QA/QC programs.

- b. Cal Advocates recommends that the WSD should require BVES to file an update each quarter through the first quarter of 2022, detailing BVES's progress on developing internal audits, and the results from any audits that were performed in the prior quarter.***

BVES will provide an update on internal audits in its 2022 WMP Update. Providing quarterly updates on this matter creates an additional administrative burden with little value added. Therefore, Bear Valley recommends that WSD not adopt Cal Advocates' recommendation to require quarterly updates on BVES's internal audits.

- c. Cal Advocates recommends that the WSD should require BVES to explain its internal audit procedures in its 2022 WMP Update.***

Bear Valley does not oppose Cal Advocates' recommendation.

- d. Cal Advocates recommends that the WSD should require BVES to implement quality assurance and quality control processes for asset inspections by the end of 2021, rather than 2022 as BVES proposes. BVES should submit a report by October 2021.***

Bear Valley does not oppose Cal Advocates' recommendation but notes that it will need to seek additional contracted resources to develop these QA/QC processes.

- e. Cal Advocates recommends that BVES should include a detailed description of its QA/QC program for asset inspections in its 2022 WMP Update.***

Bear Valley does not oppose Cal Advocates' recommendation. BVES will need to work with additional contracted resources to develop the QA/QC processes.

2. Risk Modelling & Proactive Safety Power Shutoff ("PSPS") Thresholds

- a. ***Cal Advocates recommends that the WSD require the small and multi-jurisdictional Utilities (“SMJUs”) to justify their deenergization wind speed thresholds.***

Bear Valley does not oppose Cal Advocates’ recommendation.

- b. ***GPI recommends that the SMJUs explain how they are addressing their outage and ignition-risk-driver data shortage issue in the next annual update. They should also provide a summary of how the data limitations have limited their ability to accurately model probability of ignition and overall wildfire risk, and how they intend to overcome these hurdles. All SMJUs should also provide a summary of risk model vetting and validation outcomes, including ability to predict past outage and or ignition events.***

Bear Valley does not oppose GPI’s recommendation.

- c. ***GPI recommends that all SMJUs provide a more detailed summary of how they vetted and validated their models, including the outcomes and predictive capabilities of any model tests with real data.***

Bear Valley is amenable to including the information GPI recommended in its 2022 WMP Update.

- d. ***GPI recommends that the WSD and a qualified independent evaluator (“IE”) follow BVES’s quantitative wildfire risk modelling effort in order to guide and vet the process over the course of its development.***

Bear Valley does recommend WSD implement GPI’s recommendation for WSD and a qualified IE to follow BVES’s quantitative wildfire risk modelling effort in order to guide and vet the process over the course of its development. This request is not an appropriate use of IEs. BVES will work with other electrical corporations to develop its risk modelling program using industry best practices and standards.

- e. ***GPI recommends that BVES explore the ability to complete probability of ignition and wildfire consequence models in 2021***

Bear Valley is not opposed to GPI's recommendation. BVES has engaged a consultant specialized in ignition risk modelling and plans to begin work starting June 2021. Given the developed scope and timeline, BVES aims to have a working model prior to the next WMP update but will continue to build associated risk models over the next two years.

3. **BVES Wildfire Initiative Updates & Technical Workshops**

- a. *Cal Advocates recommends that the WSD convene a working group to evaluate the benefits and costs of conducting more frequent detailed inspections of distribution assets in high fire-threat districts ("HFTDs").*

Bear Valley does not oppose Cal Advocates' recommendation. The working group should focus on "risk-based inspection" methodologies to better focus inspection resources on areas that need more frequent inspection and avoid assigning resources to areas that require less frequent inspection.

- b. *Cal Advocates recommends that the WSD should hold a workshop on light detection and ranging ("LiDAR") inspections.*

Bear Valley does not oppose Cal Advocates' recommendation.

- c. *Cal Advocates recommends that the WSD should conduct a workshop on covered conductor program costs.*

Bear Valley does not oppose Cal Advocates' recommendation.

- d. *Cal Advocates recommends that the WSD require BVES to assess the potential costs and benefits of completing its Tree Attachment Removal and Pole Loading Assessment and Remediation programs sooner than the end of 2026. BVES should include this assessment in its 2022 WMP Update.*

Bear Valley does not oppose Cal Advocates' recommendation.

- e. *Cal Advocates recommends that the WSD require BVES to file a report within 30 days of the WSD's action statement to explain BVES's high rate of vegetation findings*

compared to its peer utilities and assessing the need for any immediate changes to its vegetation management processes.

BVES uses an internal company standard of 72-inch clearance specification, which exceeds General Order (“GO”) 95 standards for vegetation ROW management. This leads to more findings; especially, during the implementation period. BVES understands that a clear comparison cannot be determined across all electrical corporations when using a larger threshold through Quarterly Data Report (“QDR”) self-reporting. Going forward, BVES will report findings based on a 48-inch standard for compliance. This will allow accuracy in illustrating internal metrics (to be included as a new outcome metric in Table 3) and the utility’s reports of GO 95 non-compliant findings.¹ For the above reason, BVES does not agree that a 30-day response report is necessary. Therefore, Bear Valley recommends the WSD not adopt Cal Advocates’ recommendation.

f. Cal Advocates recommends that BVES explain why vegetation does not comply with required clearance distances, and whether vegetation management practices need to be modified.

Bear Valley explained its vegetation clearance requirements in its 2021 WMP Update as well as all previous WMP filings. Bear Valley does comply with required clearance distances per GO 95. The clearances in GO 95 are minimum clearances. BVES implemented a vegetation management (“VM”) program that exceeds the minimum GO 95 requirements in early 2018 and early data shows that the enhanced specifications are having a meaningful impact on reducing vegetation to bare wire contact events. See Table 1 below.

¹ Tables are reported in the QDR in Attachment 2.3 of Resolution WSD-011

Table 1: BVES Recorded Vegetation Contacts

Year	Vegetation Contacting Lines
2021 ²	0
2020	5
2019	5
2018	9
2017	16
2016	47

Therefore, Bear Valley recommends that WSD not adopt Cal Advocates' recommendation as it is not needed.

- g. Cal Advocates recommends that the WSD require BVES to perform a thorough audit of its vegetation management processes to determine if changes are necessary to reduce the risk of outage or ignition due to vegetation. BVES should file a report within 180 days of the WSD's action statement.***

Bear Valley is not opposed to Cal Advocates' recommendation.

- h. GPI recommends delaying less critical models in order to focus on and establish complete, foundation wildfire risk models in 2021.***

Bear Valley does not oppose GPI's recommendation. BVES has engaged a consultant specialized in ignition risk modelling and plans to begin work starting June 2021. Given the developed scope and timeline, BVES aims to have a working model prior to the next WMP update but will continue to build associated risk models over the next two years.

- i. GPI recommends a thorough assessment of BVES's general VM and asset inspection methods to ensure they are in fact complimentary and not redundant.***

Bear Valley continually reviews its VM and asset management inspection programs to ensure they are complimentary and optimal. GPI makes a recommendation without any supporting evidence or data that such an evaluation is indeed warranted. Nor does GPI

² 2021 first quarter data

provide any details on who would perform such an evaluation. Therefore, Bear Valley recommends WSD not adopt GPI's recommendation.

j. GPI recommends BVES clarify when it plans to provide proposed data on unmanned aerial vehicle ("UAV") program success

WSD guidelines on WMPs and quarterly compliance filings regarding inspection programs and results already satisfy GPI's recommendation. BVES will provide its assertion of the UAV program upon completion of the initial survey, which BVES hopes to complete before September 2021. The data will be updated in the applicable QDR, Quarterly Initiative Update, and the Quarterly Advice Letter as it is completed and in the next WMP filing in 2022. Therefore, Bear Valley recommends WSD not adopt GPI's recommendation as it is already addressed by WSD's reporting guidance.

k. GPI recommends BVES clarify if it performs an annual or bi-annual LiDAR survey.

Bear Valley does not oppose GPI's recommendation. BVES performs one LiDAR survey per year.

l. GPI recommends BVES explain why such a large proportion of poles are failing long-standing GO load design standards, particularly assuming that they are aware that the poles were installed under less rigorous and outdated standards and present a substantial wildfire risk.

Bear Valley does not oppose GPI's recommendation. When BVES assesses poles, BVES calculates the installed safety factor, which must be greater than 2.67. In this calculation, BVES requires that the stress analysis be conducted assuming that "covered conductor" will be installed on the poles. This requirement is a higher standard that was not used when poles were first installed. BVES utilizes this standard given that it has plans to replace all bare wire with covered conductor. Another reason for high failure rates, is that BVES has focused its efforts on its highest risk circuits, which are older circuits and the poles were installed many years before more rigorous standards were implemented.

- m. GPI recommends BVES justify their decision to replace bare conductor with covered conductor (“CC”) on all sub transmission lines and clarify how many circuit miles of sub-transmission CC it plans to deploy.***

Bear Valley has articulated the justification to replace bare wire with covered wire on its sub-transmission system and the number of circuit miles of bare to be replaced in its 2021 WMP Update. This was also detailed in the BVES’s 2020 WMP. Therefore, Bear Valley recommends WSD not adopt GPI’s recommendation as this would be a redundant activity.

In the last four years due to the drought, BVES service area has been classified as “Very Dry” over 33 percent of the time in the National Fire Danger Rating System (“NFDRS”). BVES service area has been also classified as “Dry” 48 percent of the time in NFDRS. Thus, BVES has significant concern that if high voltage bare conductor lines make contact with vegetation and ignite a fire, the potential for a wildfire to develop is significant.

As BVES evaluates circuits for covered conductor replacement during field inspections, evaluations for pole loading are being conducted simultaneously. BVES will look into providing updated timelines for accelerating its pole loading assessment and tree attachment removal programs in the 2022 WMP update. BVES plans to deploy 4.3 circuit miles/year of covered conductor on its sub-transmission lines. BVES has 24.8 circuit miles of bare conductors on its 34.5 kV sub-transmission system.

- n. GPI recommends additional exploration regarding how both Southern California Edison (“SCE”) and BVES could reduce the risk of PSPS on that particular line, given its importance to BVES customer load.***

Bear Valley does not oppose GPI’s recommendation for BVES and SCE to explore risk reduction measures that might be implemented on the supply lines to BVES to reduce the risk of PSPS. In the interim, Bear Valley has regular meetings with SCE to discuss the risk of cascading impacts due to PSPS activations within the SCE service territory. BVES met as recently as April 14, 2021 with SCE and regularly discusses this potential impact

to BVES's customers. BVES and SCE have established lines of communication, common terminology, and notification cadence to ensure coordination is optimal.

- o. GPI recommends that BVES's egress route hardening projects and program should include the objective to reduce wildfire risk along the egress route.*

Bear Valley agrees with GPI's objective that wildfire risk along evacuation routes should be reduced. BVES has several mitigation projects and programs that are being executed along the service area evacuation routes concurrently with the Evacuation Route Hardening Project. They include the covered wire program, fuse replacement program, pole loading and assessment program, enhanced vegetation management, and inspection (LiDAR, ground patrol, detailed inspection, UAV inspection, etc.).

III. CONCLUSION

BVES appreciates the opportunity to provide this Response. BVES respectfully submits this response.

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