



June 3, 2021

Caroline Thomas Jacobs, Director  
Wildfire Safety Division  
California Public Utilities Commission  
300 Capital Mall  
Sacramento, California 95814  
[WildfireSafetyDivision@cpuc.ca.gov](mailto:WildfireSafetyDivision@cpuc.ca.gov)

**Re: 2021 Wildfire Mitigation Plan Revision Notice Response to the Wildfire Safety Division Issuance of Revision Notice for Bear Valley Electric Service’s 2021 Wildfire Mitigation Plan Update and Notice of Extension of WSD Determination Per Public Utilities Code 8389.3(a)**

**Background**

On May 4, 2021, the Wildfire Safety Division (“WSD”) issued a Revision Notice (“Notice”) in conjunction with the initial review of Bear Valley Electric Service, Inc.’s (“BVES’s” or “Bear Valley’s”) 2021 Wildfire Mitigation Plan (“WMP”) Annual Update. The Notice identified critical issues to be resolved within 30 days of the issuance. BVES filed its 2021 WMP on March 5, 2021 with guidance from the WMP template under Resolution WSD-011. Following respondent entity submissions, the WSD instituted a revision process to allow utilities to make corrections to or remedy identified defects in their 2021 WMP filings ahead of the approval process.

BVES hereby submits its 2021 WMP Update Revision in an attempt to resolve the discussed items below. Included with the 2021 WMP Update Revision, is a redlined comparison to the March 5 filing and the auxiliary Attachment 2.3 (Quarterly non-spatial data template), which includes the Table 12 update.

**Discussion**

Under the summary of critical issues and required remedies statement, presented in Table 1 below, the WSD highlights two key directives. BVES-01 directs BVES to revise Section 7.3 of its 2021 WMP Update to adhere to Attachment 2.2 of the WMP Guidelines template. In response, the 2021 WMP Update reflects inclusion of all the established WMP initiative activities in accordance with the compliance guidelines. BVES also worked across internal departments to reclassify 2020 WMP expenditures and projected budgets to reflect the descriptions of applicable initiative activities more accurately. This is now updated in Section 7.3 and Attachment 2.3.

This effort subsequently addresses BVES-02, which indicates a need of revisal of the spend actuals for 2020 and projected budgets of the newly disaggregated activities within the WMP.

*Table 1: WMP Revision Notice - Summary of Critical Issues and Required Remedies*

<b>Critical Issue No.</b>	<b>Critical Issue Title</b>	<b>Critical Issue Explanation</b>	<b>Summary of Remedy Sought by WSD</b>
BVES-01	Incomplete Section 7.3, “Detailed Wildfire Mitigation Programs”	BVES’s 2021 WMP Update does not comply with the 2021 WMP Guidelines. BVES has defined and labeled initiatives in each of the 10 categories under Section 7.3 using its own system. BVES’s departure from the 2021 WMP Guidelines constitutes a failure of the completeness” requirement.	BVES shall submit a revised Section 7.3 that adheres to the 2021 WMP Guidelines using the WSD-defined initiatives and labeling.
BVES-02	Inappropriate Aggregation of Expenditure Data	Resolution WSD-002 Condition Guidance-5 requires utilities to report spend on each individual initiative. BVES details 51 initiatives in the text of its 2021 WMP Update. However, in Table 12, BVES aggregates its expenditures, reporting expenditures for just 25 initiatives.	BVES shall submit a revised Table 12 in which expenditures are reported for each individual initiative identified in its 2021 WMP Update.

In past WMP filings, BVES presented project and program level information with minimal unbundling of applicable initiative activities. BVES has enhanced its record-keeping and data collection processes within the last year by developing more precise disaggregated expenditures. BVES will continue to make improvements to its activity classification as programs and projects within the WMP are executed and refined.

**Conclusion**

This submission is in response to the Notice issued by the WSD on May 4, 2021. Included in this 2021 WMP Revision Notice response are the following updated documents:

1. 2021 WMP Update Revision (Version 2)
2. 2021 WMP Update Revision redlined against 2021 WMP Annual Update filing
3. Table 12 of Attachment 2.3 WMP quarterly report – non-spatial data template

Respectfully submitted,

Bear Valley Electric Service, Inc.

\_\_\_\_\_  
/s/ Paul Marconi  
Paul Marconi  
President