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California Public Utilities Commission

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PUBLIC ADVOCATES OFFICE DATA REQUEST

No. CalAdvocates-BVES-2022WMP-08
Proceeding: 2022 Wildfire Mitigation Plans

Date of issuance: Tuesday, May 31, 2022
Due date: Friday, June 3, 2022

To: **Paul Marconi**
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INSTRUCTIONS

You are instructed to answer the following Data Request in the above-captioned proceeding, with written, accurate responses per Public Utilities Code §§ 309.5(e) and 314, and Rule 1.1 of the California Public Utilities Commission's (CPUC's) Rules of Practice and Procedure, and the Office of Energy Infrastructure Safety's guidelines for 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. Natalie.Monroe@cpuc.ca.gov
4. Dillon.Copa@cpuc.ca.gov
5. Amanda.Asadi@cpuc.ca.gov
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7. Benjamin.Katzenberg@cpuc.ca.gov

Requests for Clarification: If a request, definition, or instruction, is unclear, please notify the originators in writing 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.

¹ Office of Energy Infrastructure Safety, *Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines*, December 15, 2021. See Attachment 5: Guidelines for Submission and Review of 2022 Wildfire Mitigation Plan Updates, pp. 10-11.

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. Please submit your deadline extension request as soon as feasible. 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.

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. *At the latest*, submit your objections and legal bases by the objection deadline on the cover sheet.

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

- All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible.
- Each page should be numbered.
- If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning.
- Documents produced in response to the data request should be Bates-numbered and, if voluminous, indexed.
- Responses to the data request that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

Other questions: For any questions, email the originators (the Public Advocates Office employees listed on the cover page), including the Public Advocates Office’s attorney.

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.
 - N. “GIS” means Geographic Information System.
 - 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”).² 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.

² 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. “VM” means vegetation management.
- U. “AFN” means access and functional needs.

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

Question 2

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 AFN customers and medical baseline customers, *in addition to* all critical facilities?
- b) If the answer to part (a) is no, please describe the limitations that would prevent this.

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

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?
- b) Please describe the actions BVES took in 2021 to collect comprehensive data on AFN populations.
- c) Please describe the efforts BVES plans to undertake to collect comprehensive data on AFN populations in 2022.

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.

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.
- b) Q2 of 2021.
- c) Q3 of 2021.
- d) Q4 of 2021.

- e) Q1 of 2022.

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

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."

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?
- 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.

- 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.

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.
- 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?
- 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.

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.

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?
- b) If the answer to part (a) is yes, please describe the QA/QC actions that BVES performed for detailed asset inspections in 2021.
- 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.
- d) If the answer to part (a) is no, please explain why not.

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

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.

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.
- b) Initiative 7.3.4.11, patrol inspections of distribution electric lines and equipment.
- c) Initiative 7.3.4.9.1, Third party (second) ground patrol – detailed inspection program.

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.
- b) Initiative 7.3.4.11, patrol inspections of distribution electric lines and equipment.
- c) Initiative 7.3.4.9.1, Third party (second) ground patrol – detailed inspection program.

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

END OF REQUEST