

Bear Valley Electric Service, Inc. Public Safety Power Shutoff Plan

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Approved by: _____
Paul Marconi, President, Treasurer & Secretary

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Public Safety Power Shutoff Plan**

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1. Purpose and Overarching Guidelines

1.1. **Purpose of PSPS.** The purpose of proactive de-energization is to promote public safety by decreasing the risk of utility-infrastructure as a source of wildfire ignitions. Generally, proactive de-energization will be referred to as Public Safety Power Shutoff (PSPS), which is consistent with the terminology used by the major California investor owned utilities.

1.2. **Purpose of PSPS Plan.** This document provides the policies and procedures of Bear Valley Electric Service, Inc. (“BVES”) follows with regard to PSPS and addresses the following operational issues:

- PSPS advance planning and preparations prior to the fire season.
- Procedures leading up to, during, and following extreme fire threat weather events in which PSPS may be invoked. These include BVES’s operational fire prevention actions and procedures.
- Public outreach, coordination with local and government officials, advisory boards, public safety partners, representatives of people/communities with access and functional needs (“AFN”), tribal representatives (if applicable), senior citizen groups, business owners, and public health and healthcare providers including those with medical needs. This includes a Community Resource Center (“CRC”) and communications regarding PSPS.

It should be noted that two other BVES documents provide information important to PSPS:

- ***BVES Emergency Response Plan:*** Provides comprehensive outage management procedures, which are applicable to all outages including outages as a result of PSPS. The BVES PSPS Plan is designed to work in conjunction with the ERP and not duplicate existing procedures.
- ***BVES Wildfire Mitigation Plan:*** Provides description of system hardening projects, operations and maintenance programs, and other initiatives being pursued by BVES to mitigate the need to execute a PSPS and/or to mitigate the impact of PSPS events. As these projects and programs are completed, this document will be updated as necessary to incorporate the improvements achieved.

1.3. **Compliance.** This documented includes requirements invoked by:

- Safety and Enforcement Division Resolution, Electric Safety and Reliability Branch Resolution ESRB-8 8 of July 12, 2018: Resolution Extending De-Energization Reasonableness, Notification, Mitigation and Reporting Requirements in Decision 12-04-024 to All Electric Investor Owned Utilities.
- California Public Utilities Commission Decision 19-05-036 of May 30, 2019: Guidance Decision on 2019 Wildfire Mitigation Plans Submitted Pursuant to Senate Bill 901.

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- California Public Utilities Commission Decision 19-05-040 of May 30, 2019: Decision on 2019 Wildfire Mitigation Plans of Liberty Utilities/CalPeco Electric; Bear Valley Electric Service, a Division of Golden State Water Company; and Pacific Power, a Division of PacifiCorp Pursuant to Senate Bill 901.
- California Public Utilities Commission Decision 19-05-042 of May 30, 2019: Decision Adopting De-Energization (Public Safety Power Shutoff) Guidelines (Phase 1 Guidelines).
- California Public Utilities Commission Decision 20-03-004 of March 12, 2020: Decision on Community Awareness and Public Outreach Before, During and After a Wildfire, and Explaining Next Steps for Other Phase 2 Issues.
- California Public Utilities Commission Decision D20-05-051 of May 28, 2020: Decision Adopting Phase 2 Updated and Additional Guidelines for De-Energization of Electric Facilities to Mitigate Wildfire Risk.

1.4. **Measure of Last Resort.** BVES must only deploy PSPS as a *measure of last resort* and must justify why PSPS was deployed over other possible measures or actions. This plan provides courses of action to be taken leading up to possible PSPS such that an actual PSPS is the measure of last resort.

1.5. **Customer Engagement.** Customers and other impacted stakeholders should understand the purpose of PSPS, BVES's process for initiating it, how to manage safely through a PSPS event, and the impacts if deployed. To accomplish this, the BVES shall:

- Develop and use a common nomenclature that integrates with existing state and local emergency response communication messaging and outreach and is aligned with the California Alert and Warning Guidelines.
- Develop notification and communication protocols and systems that reach customers no matter where the customer is located and deliver messaging in an understandable manner.
- Communicate to customers in different languages and in a way that addresses different access and functional needs using multiple modes/channels of communication.
- Coordinate a Community Resource Center and work with local organizations.

1.6. **PSPS Coordination.** Deploying PSPS requires a coordinated effort across multiple state and local jurisdictions and agencies. Coordination in preparation for PSPS is a shared responsibility between BVES, public safety partners, and local governments; however, BVES is ultimately responsible and accountable for the safe deployment of PSPS. BVES must work with the California Governor's Office of Emergency Services to integrate its warning programs with the agencies and jurisdictions within California that have a role in ensuring that the public is notified before, during, and after emergencies. Throughout this document the collective phrase "Local Government, Agencies, and Partner Organizations" includes applicable local government and agencies, utilities, key non-government and commercial entities and also includes critical facilities and critical infrastructure. Further discussion is provided in Section 5.

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BVES, emergency responders, and local governments need to be seamlessly integrated when communicating PSPS notifications, with the goal that local governments provide supplemental or secondary notifications in the near future given the primary or initial notification to the public provided by utilities. For now, BVES retains ultimate responsibility for notification and communication throughout a PSPS event.

BVES must coordinate with California Governor's Office of Emergency Services and the California Department of Forestry and Fire Protection to engage in a statewide public education and outreach campaign. The campaign must effectively communicate in multiple languages. The campaign must convey, in advance of wildfire season, the immediate and increasing risk of catastrophic wildfires and how to prepare for them, the impacts of PSPS, how the public can prepare for and respond to a PSPS event, what resources are available to the public during these events, what to do in an emergency, how to receive information alerts during a power shutoff, and who the public should expect to hear from and when.

1.7. PSPS Is an Emergency. Consequences of PSPS should be treated in a similar manner as any other emergency that may result in loss of power, such as earthquakes, floods or non-utility caused fire events. BVES must avoid development of duplicative or contradictory messaging and notification systems to those already deployed by first responders.

1.8. Reporting and Continuous Improvement. BVES must report on lessons learned from each PSPS event, including instances when PSPS protocols are initiated, but de-energization does not occur, in order to further refine PSPS practices.

BVES must work together with the other electric investor-owned utilities to share information and advice in order to create effective and safe PSPS programs at each utility and to ensure that utilities are sharing consistent information with public safety partners.

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2. Chain of Responsibility

2.1. **President** is overall responsible for the PSPS Plan and ensuring it is properly implemented, resourced, trained upon, executed, and updated as appropriate. Furthermore, the President shall ensure proper communications and coordination with local government, agencies and customers.

2.2. **Utility Manager** is responsible for executing the BVES PSPS Plan to include:

- Directing emergency operations per this plan and the Emergency Response Plan;
- Ensuring that monitoring of weather forecasts and actual weather conditions is being properly conducted by appropriate staff per this plan;
- Directing (or causing to be directed) the operational activities related to system line-up and PSPS as warranted;
- Ensuring that Field Operations staff are providing timely and accurate information to the Customer Service Supervisor and/or other staff performing customer and public information functions;
- Working closely and coordinating with counterparts at local government and agencies during the lead up to PSPS, during PSPS, and during restoration procedures and as necessary to achieve the fire prevention objectives of this plan;
- Overseeing activation of the Wildfire Response Team (WRT) for PSPS procedures of this plan and determining the appropriate staff composition of the WRT when activated;
- Training (or causing to be trained) BVES staff assigned to perform the various activities required by this plan;
- Ensuring resources are available to properly execute this plan and identifying any gaps in resources to the President as well as proposed remedies;
- Making all reports required by GO-166 and ESRB-8 to the applicable Commission Divisions;
- Working closely with Regulatory Affairs staff to ensure this plan meets regulatory compliance requirements enacted by the Commission;
- Reviewing and evaluating relevant data and documentation of inspections, patrols, operational system lineup, and PSPS activities; and
- Evaluating at least annually, whether changes to this plan are warranted and implementing any necessary changes.

2.3. **Field Operations Supervisor** is responsible for directing operations in the field to include:

- Monitoring (or causing to be monitored) weather advisories, consultant forecasts, and the NFDRS forecast frequently and at least daily;
- Directing and managing operational system line-ups based on conditions as described in this plan;
- Directing and managing PSPS procedures of this plan;
- Directing the activities of the WRT;

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- Controlling all switch and system lineup operations;
- Providing (or causing to be provided) timely and accurate information to the Customer Service Supervisor and/or other staff performing customer and public information functions;
- Informing the Utility Manager of any system degradations;
- Collecting relevant data and maintaining documentation of inspections, patrols, operational system lineup, and PSPS activities; and
- Submitting to the Utility Manager recommended changes to this plan as warranted and at least annually.

2.4. **Utility Engineer & Wildfire Mitigation Supervisor** is responsible for fire prevention planning and engineering design of the electric distribution, sub-transmission and substations to include:

- Ensuring system design and construction is in compliance with applicable government rules and regulations to mitigate fire;
- Developing distribution, sub-transmission and substations designs that would enhance fire prevention;
- Researching, evaluating, and sourcing materials that would enhance fire prevention;
- Developing device protective settings and selecting fuses that enhance fire prevention while taking into account the served load demand;
- Supporting Field Operations and the WRT as directed by the Utility Manager in the execution of system operations per this plan; and
- Submitting to the Utility Manager recommended changes to this plan as warranted and at least annually.

2.5. **Customer Program Specialist** under the supervision of the Customer Service Supervisor and the Energy Resource Manager is responsible for the BVES Communications Plan to include:

- Making (or causing to be made) local government, agency, and customer notifications per this plan;
- Ensuring pre-planned statements are PSPS related notifications per this plan;
- Establishing and maintaining customer communications methods, systems, and equipment to support proactive de-energization notifications per this plan;
- Training staff assigned to perform customer and public information functions on generating customer and media notification statements and utilizing the customer communications methods, systems, and equipment;
- Developing (or causing to be developed) the contact list of local government and agencies per this plan;
- Directing a customer education strategy to inform customers about BVES's fire mitigation programs, policies and procedures including PSPS; and
- Submitting to the Utility Manager recommended changes to this plan as warranted and at least annually.

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3. BVES Specific Background Information

3.1. Service Area Description and Environment. Bear Valley Electric Service is a small electric utility, located in the mountain resort community of Big Bear Lake, California, that provides service to approximately 24,500 customers in a 31-square mile service area. BVES owns and operates 87.8 miles of overhead 34.5 kilovolt sub-transmission miles, 2.7 miles of 34.5 kilovolt underground sub-transmission miles, 488.6 miles of overhead distribution circuit miles, 89.1 miles of underground distribution circuit miles, 13 sub-stations and a natural gas-fueled 8.4 MW peaking generation facility. The BVES service area is rural and mountainous and is served predominantly from bare wire overhead facilities. BVES's entire service area is under the jurisdictional responsibility of the City of Big Bear Lake and some areas (unincorporated) under the responsibility of the County of San Bernardino. The San Bernardino Mountains and forests are managed by the United States Forest Service, California Environmental Protection Agency, and the California Department of Fish and Wildlife.

3.1.1. Since the service territory is entirely above 3,000 feet, all construction is required to conform to "heavy" loading standards of GO-95. In addition, the high elevation provides for a beautiful alpine, heavily treed, mountainous environment that is vulnerable to wildfires. The entire service area is within the High Fire-Threat Districts and has areas designated as Tier 2 and Tier 3 per GO-95 Rule 21.2. Additionally, some of BVES's service area overlap with the Zone 1 per GO-95 Rule 21.2. Therefore, all construction, inspection, vegetation management, and emergency planning must also conform to the High Fire-Threat District requirements of GO-95, GO-165, and GO-166.

3.1.2. Bear Valley serves as a desirable vacation destination during the winter months due to the local ski resorts and winter activities. This creates a winter peaking environment that is enhanced by local snow making activity during the late evening hours. After the normal winter months, the population and load profile dramatically change. Understanding the local load profile is one key element to designing a successful fire prevention strategy.

3.2. Susceptibility to PSPS. The BVES service area is susceptible to several conditions in which PSPS would have a direct impact to its customers. These are:

- Extreme fire threat weather and conditions in BVES's service area that warrant BVES to implement PSPS on BVES owned and operated power lines in some or all areas of its service area.
- Extreme fire threat weather and conditions outside of the BVES's service area, in which Southern California Edison (SCE) directs PSPS on SCE owned and operated power lines leading to a partial or complete loss of the three SCE supply lines into the BVES service area. Note that it is very possible that the extreme fire threat weather and conditions causing SCE to de-energize its supply lines to BVES may not exist in the BVES service area. In this case, BVES would seek to supply power to its customers using all available power resources.

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- Combination of the above, PSPS is warranted in some or all areas of the BVES service area and SCE has implemented PSPS actions that result in a partial or complete loss of supplies to the BVES service area.

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4. BVES Fire Prevention Procedures

4.1. **Fire Prevention.** Because PSPS is an operational safety measure of last resort, it is logical that the PSPS Plan include BVES's operational fire prevention plan measures so that the progression of operational steps to be taken by BVES staff is properly sequenced and understood by all stakeholders.

4.1.1. Ordering Paragraph 5 of D.12-01-032 required BVES to prepare a Fire Prevention Plan to identify the occurrence of 3-second wind gusts that exceed the structural and mechanical design standards for overhead power-line facilities. D.14-05-020 modified D.12-01-032 by eliminating the requirement to identify 3-second wind gusts in real time, provided a utility will still address the situation when all three of the following conditions occur simultaneously: (i) 3-second wind gusts exceed the structural or mechanical design standards for the affected overhead power-line facilities, (ii) these 3-second gusts occur during a period of high fire danger, and (iii) the affected facilities are located in a high fire-threat area. D.14-05-020 also required utilities to identify the specific parts of their service territories where all three conditions listed in Ordering Paragraph I (a) occur simultaneously, based on a minimum probability of 3% over a 50-year period that 3-second wind gusts which exceed the design standards for the affected facilities will occur during a Red Flag Warning in a high fire-threat area. Ordering Paragraph 2 of D.17-12-024 requires each electric investor-owned utility have a fire prevention plan for facilities in the High Fire-Threat District containing the information specified in General Order ("GO") 166, Standard 1, Part E, to the extent applicable to the electric utility's service area and to file a report containing the fire prevention plan annually beginning October 31, 2018.

4.1.2. In accordance with D.12-01-032, D.14-05-020, D.17-12-024, and GO-166, this plan lists and describes the operational fire prevention measures BVES intends to implement to mitigate the threat of power-line fires generally and in the situation where all three of the conditions listed in GO-166, Standard 1, Part E occur simultaneously. BVES has identified areas that could be susceptible to these conditions. These areas are heavily forested, abundant in available fuel and could threaten the system when high winds occur. When these conditions exist, BVES has pre-identified areas that are targeted for PSPS in Appendix B.

4.1.3. Note that as previously stated, BVES's Wildfire Mitigation Plan provides descriptions of system hardening projects, operations and maintenance programs, and other initiatives being pursued by BVES to mitigate wildfire. Therefore, the PSPS Plan in conjunction with the Wildfire Mitigation Plan satisfy BVES's Fire Prevention Plan compliance requirements.

4.1.4. The fire prevention plan is intended as a starting point. As system improvements are made and environmental conditions change, the plan will evolve to meet these changes. In creating the plan, BVES has incorporated the input and interests of our stakeholders to ensure that the needs of the community are effectively met while mitigating the risk of wildfire. Community outreach and communications are a key

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component of this plan as well as maintaining partnerships with the Big Bear Valley Mountain Mutual Aid Association, City of Big Bear Lake, San Bernardino County, Big Bear Fire Department, Big Bear Lake Sheriff's Department, other local agencies, local utilities, local radio stations, news media, and the public.

4.2. **Wildfire Mitigation Strategy.** BVES's approach to mitigating wildfire is described in its Wildfire Mitigation Plan (WMP) and is a comprehensive mitigation strategy focused on five principal functional areas to enhance public safety:

- **Design & Construction:** This strategy is discussed in BVES's WMP and is designed to provide effective long-term mitigation solutions that reduce the likelihood of wildfire and also reduce the reliance on other short-term wildfire mitigation measures that have an adverse impact on customers, such as PSPS.
- **Inspection & Maintenance:** This strategy, also detailed in BVES's WMP, is designed to provide effective wildfire risk mitigation where system Design & Construction fall short. For example, where bare conductor is employed, the vegetation management program is essential to mitigating wildfire risk.
- **Situational & Conditional Awareness:** This strategy, detailed in BVES's WMP, is designed to provide decision makers and Field Operations staff critical information so that operational decisions are made on the most accurate information available. Additionally, collecting metrics overtime provide a better picture of the wildfire risk drivers and inform Design & Construction and Inspection & Maintenance strategies.
- **Operational Practices:** This plan mostly focuses this strategy but it is also discussed in the WMP. The Operational Practices strategy is designed to provide effective wildfire risk mitigation where system Design & Construction, Inspection & Maintenance, and Situational & Conditional Awareness fall short. For example, Line crews are required by BVES' procedures to perform circuit patrols during high fire threat conditions upon restoration from outages on circuits with bare conductor.
- **Response & Recovery:** This strategy is designed to provide BVES's plan to respond to wildfires and following wildfires regardless of how the wildfire started.

4.3. **Operational Practices.** This plan focuses on the operational practices to mitigate the need for PSPS so that PSPS is ultimately the measure of last resort during extreme fire threat weather conditions. The following operational tools, which will be discussed further in this procedure, are available to be utilized as conditions warrant and should be exhausted before PSPS is employed (these are not listed in order of priority):

- Set automatic reclosing devices to Manual.
- Set electronic fuses (TripSavers) to Manual.
- Adjust system lineup.
- Conduct circuit patrol when circuit protective device trips for an unknown cause prior to re-energization.
- Have Service Crew and Field Inspector patrol service area focusing on high risk areas.

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- Deploy wildfire Response Team(s) to high fire risk areas.
- Adjust protective device settings optimized for fire prevention.
- Increase frequency of consultant meteorologist forecast.
- Increase monitoring of weather stations, forecasts, and fire threat conditions.
- Increase communications with Southern California Edison points of contact.
- Proactively engage with first responders, local government and agencies, and other stakeholders.
- Proactively communicate with customers and other stakeholders.
- Identify Medical Baseline customers and Access and Functional Needs populations that may be impacted.
- Prepare to activate Community Resource Center.
- Activation of Emergency Operations Center and Emergency Response Plan.
- Prepare Bear Valley Power Plant for sustained operations.
- Conduct switch operations to minimize impact of potential PSPS activity.
- Engage temporary generation.
- Activate Community Resource Center.

4.4. **Condition Based Operational Measures.** BVES's operational measures to prevent fire are condition based to ensure the BVES system is optimized for wildfire mitigation, public safety, and reliability. There are two specific levels of conditions in the BVES service area that are considered when determining the appropriate operational measures to be implemented:

- **Seasonal Considerations:** Provide a high level operational system lineup and operating guidance to Field Operations crews.
- **Daily-to-Real-time Considerations:** Provide granular operational system lineup and operating guidance to Field Operations crews based on specific forecasts of the weather and fire threat conditions and current system degradations, which may be due to maintenance activities and/or known equipment and/or facilities failure or degradation. Daily-to-Real-time considerations always override seasonal considerations. For example, having high fire threat weather conditions in January is not common, but possible; therefore, in this case, system and operational guidance would be optimized to prevent wildfires.

4.5. **Seasonal Considerations.** Understanding BVES's system demand, service area environmental factors, and wildfire risk drivers allows BVES to operate the system in a manner that is optimized for public safety including wildfire mitigation, reliability, and increased quality of service delivered. The winter months (November through March) bring the following characteristics to BVES's service area:

- Heaviest load demand due to increased tourism and ski resort snowmaking;
- Low ambient temperatures that frequently go below freezing; and
- Lower wildfire risk due to snow and higher moisture content in the service area.

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When electric power is not available for any reason combined with freezing temperatures, the situation is an even greater public safety concern. Therefore, BVES needs to recognize that under these conditions, system reliability and continuity of electric service is important to public safety and every effort should be taken to restore power in a safe and timely manner.

The non-winter months (April through October) bring the following characteristics to BVES's service area:

- Lower load demand due to reduced or minimal tourism and no ski resort snowmaking, therefore BVES's load is generally lowest in April, May, September and October; the load increases somewhat in the summer months of June, July and August;
- Higher ambient temperatures with low humidity that rarely require air conditioning; and
- Higher wildfire risk due to low moisture content in the service area and increase presence of fuel (dry vegetation).

Therefore, during the winter months as described above, the BVES distribution system is optimized for safety and reliability. Following the winter season, the system operational focus is more defensive and optimized almost entirely for fire prevention.

4.6. Daily-to-Real-time Considerations. The daily and even hourly changes in environmental and system conditions can change the risk of wildfire significantly. Therefore, the factors affecting Daily-to-Real-time considerations must be understood and be evaluated by the Operations Team to develop the appropriate risk mitigation package on a daily or even more frequently when adverse factors develop or are expected to develop. Some the factors that the Operations Team needs to consider are:

- **Forecasted and actual weather:** Sustained wind speed, wind gust strength, dryness (humidity), precipitation, etc.
- **Fuel inventory:** Buildup of ground cover vegetation, timber on the ground, thickness of forest, etc.
- **Dryness of fuel:** Dryness of dead vegetation, timber on the ground, etc.
- **System design limitations:** Installed bare conductor configuration, conventional expulsion fuses installed in the system, switches with limited protective and remote control capabilities, etc.
- **T&D equipment failure or degradation:** Protective switch failure, loss of remote connectivity with protective devices, etc.
- **Missed or delayed inspection:** Detailed inspection or patrol per GO-95 missed or delayed, GO-174 inspection missed or delayed, other inspection deemed critical missed or delayed, etc.

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- **Delayed correction of fire hazard inspection discrepancies:** Correction of “must be fixed before fire season” discrepancies, GO-95 discrepancies not corrected within required periodicity, etc.
- **Operational deviations from normal lineup:** Abnormal system lineup due to planned maintenance, system upgrades, equipment degradation, etc.
- **Degradation in situational awareness:** Failure or loss of connectivity with installed weather stations, loss of NFDRS (e.g., during Federal Government shutdown), loss of remote circuit monitoring, loss of HD Alert Camera coverage, etc.
- **Resource degradation:** Insufficient line crews and/or other key operation staff, loss of utility vehicles, etc.

Therefore, for obvious reasons and as previously stated **Daily-to-Real-time considerations always override seasonal considerations.**

4.7. **Pre-Planned Operational Posture.** Some of the factors discussed in the previous section, may have a determined utility condition based response posture, while others require the specific evaluation by the Operations Team of the particular issue. The operational actions to be taken for forecasted and actual weather, fuel inventory, dryness of fuel, and system design limitation consideration factors are easily pre-determined. Whereas the response to the rest of the Daily-to-Real-time consideration factors, must be individually evaluated to determine their impact on the overall plan. For example, if certain weather stations suffer a failure, the Utility Manager may require the Wildfire Response Team be deployed sooner in a high wind developing situation.

4.7.1. **Seasonal Operational Posture:** The following operational actions are to be taken as follows:

- The Radford Line will be de-energized from April to October. Specific dates will be recommended by the Field Operations Supervisor and approved by the Utility Manager. The line will be ready for re-energization should the load demand require it, for planned maintenance or system upgrades, or for other operational reason approved by the Utility Manager. De-energizing the Radford Line does not degrade redundancy since the supply lines from Lucerne are separate and independent of each other. The Radford Line is simply needed to assist with winter high loads. The Utility Manger will inform the President of any changes in the status of the Radford Line.
- From April to October, certain Auto-Reclosers and Switches shall be placed in “Manual” (e.g., they will not shut and test upon detecting a fault). The Field Operations Supervisor will develop a specific list of the devices to be placed in “Manual” and will forward the list to the Utility Manager and President. Specific dates will be recommended by the Field Operations Supervisor and approved by the Utility Manager. Once BVES’s Grid Automation Project establishes connectivity and control of these devices, this policy will be re-evaluated.

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- From April to October, all Fuse TripSavers shall be placed in “Manual” (e.g., they will not shut and test upon detecting a fault). Specific dates will be recommended by the Field Operations Supervisor and approved by the Utility Manager. Once BVES’s Grid Automation Project establishes connectivity and control of these devices, this policy will be re-evaluated.
- Due to reduced load in non-winter period, the Utility Engineer & Wildfire Mitigation Supervisor will develop specific settings for Auto-Recloser and other protective devices in the field to enhance fire prevention. The list of affected devices will be provided to the Utility Manager and the Field Operations Supervisor. Additionally, the Field Operations Supervisor will be provided the settings that the Field Operations staff will be required to set on each device. Specific dates to enter these reduced settings will be recommended by the Field Operations Supervisor and approved by the Utility Manager. Engineering staff will not change device settings without the Field Operations Supervisor’s authorization.
- When an Auto-Recloser, Switch, or Fuse TripSaver that was placed in “Manual” due to the above policy trips open, the affected portions of the de-energized circuit or feeder will be patrolled prior to re-energizing them. If the cause is likely known and the fire risk is “Green” or “Yellow,” the Field Operations Supervisor may authorize the Line Crew to test the device once. If the device trips open again, the circuit or feeder must be thoroughly patrolled to determine the fault and ensure there is no risk of causing fire.

4.7.2. **Daily-to-Real-time Operational Posture:** The pre-planned operational postures provided in this section take into account the System Design Limitations factor. As system hardening and other Wildfire Mitigation Plan projects and programs are completed thereby mitigating the risk to wildfire, the Utility Manager will recommend updates to the plan.

BVES’s forecasting framework for fire prevention measures relies on the National Fire Danger Rating System (NFDRS) and contracted meteorologist evaluation of the local forecast. The entire BVES system is in NFDRS Predictive Service Area SC10. The predictive service provides a wildfire risk forecast based on weather, on fuel build up, and fuel dryness among other factors and designates high-risk days as indicated in Table 4-1, Fuel Dryness and High-Risk Days, below:

Table 4-1: Fuel Dryness and High-Risk Days

Fuel Dryness & High Risk Days	Rating	Description
Green	Moist	Little to no risk of fires.
Yellow	Dry	Low risk of large fires in the absence of a “High Risk” event.

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Brown	Very Dry	Low/moderate risk of large fires in the absence of a “High Risk” event.
Orange	High-Risk Day	At least a 20% chance of a “Large Fire” due to a combination of either “Dry” or “Very Dry” fuel dryness and a critical burn environment (e.g., Santa Ana winds).
Red	High-Risk Day	At least a 20% chance of a “Large Fire” due to a combination of either “Dry” or “Very Dry” fuel dryness and an ignition trigger (lightening).

An example of the seven-day forecast is provided below in Table 4-2, Example NFDRS Forecast:

Table 4-2: Example NFDRS Forecast

SC09-Western Mountains	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Brown
SC10-Eastern Mountains	Brown						
SC11-Southern Mountains	Yellow	Yellow	Yellow	Yellow	Yellow	Brown	Yellow

The NFDRS is generally updated 3-5 times per day. Additionally, it should be noted that it has been observed that during the Federal Government shutdowns due to budget issues, the NFDRS forecast is suspended. Therefore, during these periods, the Utility Manager must recommend measures to mitigate this degradation in situational awareness.

The contracted meteorologist integrates the NFDRS with the detailed local forecast specific to BVES’s service area and develops a risk rating as indicated below in Table 4-3, Significant Fire Potential.

Table 4-3: Significant Fire Potential

Significant Fire Potential	
	Little or no risk.
	Low risk
	Moderate risk
High Risk Triggers	
	W
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The Field Operations Supervisor will monitor the fire risk as designated by the consultant meteorologist, the NFDRS fire danger forecast, and indications from installed weather stations, which are equipped with alarms based on actual wind speed and then direct the proper operational pre-planned response. As indicated in Table 4-4 below, “Brown”, “Red”, and “Orange” are considered elevated fire threat conditions that require the BVES system to be configured for fire prevention over reliability concerns.

Table 4-4: Operational Direction Based on Wildfire Risk Forecast

Operations Pre-Planned Action	Green	Yellow	Brown	Orange	Red
Auto-Reclosers and Protective Switches with Reclosing Capability ¹	Automatic ¹	Automatic ¹	Manual (Non-Automatic)		
Patrol following circuit or feeder outage ²	No ^{2,3}	No ^{2,3}	Yes		
Fuse TripSavers ¹	Automatic ¹	Automatic	Manual (Non-Automatic)		
Radford Line Use ⁴	May be energized	May be energized	De-energize ⁵	De-energize	De-energize
Deploy Wildfire Risk Team(s) to “high risk” areas	No	No	Yes, if forecasted sustained wind or 3-second wind gusts expected to exceed 55 or actual sustained wind or 3-second wind gusts exceed 45 mph and expected to increase.		
Forward to Field Operations updated list of medical baseline customers and impacts access and functional needs population	No	No	Yes, if forecasted sustained wind or 3-second wind gusts expected to exceed 55 or actual sustained wind or 3-second wind gusts exceed 45 mph and expected to increase.		
Activate EOC	No	No	Yes, if forecasted sustained wind or 3-second wind gusts expected to exceed 55 or actual sustained wind or 3-second wind gusts exceed 45 mph and expected to increase.		
Prepare Bear Valley Power Plant for sustained operations.	No	No	Yes, if forecasted sustained wind or 3-second wind gusts expected to exceed 55 or actual sustained wind or 3-second wind gusts exceed 45 mph and expected to increase.		
Conduct switching operations to minimize impact of potential PSPS activity	No	No	Yes, if forecasted sustained wind or 3-second wind gusts expected to exceed 55 or actual sustained wind or 3-second wind gusts exceed 45 mph and expected to increase.		
Activate first responder, local government and agency, customer and community, and stakeholders PSPS communications plan	No	No	Yes, if forecasted sustained wind or 3-second wind gusts expected to exceed 55 or actual sustained wind or 3-second wind gusts exceed 45 mph and expected to increase.		
Activate Community Resource Centers	No	No	Yes, if forecasted sustained wind or 3-second wind gusts expected to exceed 55 or actual sustained wind or 3-second wind gusts exceed 45 mph and expected to increase.		
Public Safety Power Shutoff	No	No	Yes, if actual sustained wind or 3-second wind gusts exceed 55 mph. ⁶		

¹ During the non-winter months, certain devices as developed by the Field Operations Supervisor and approved by the Utility Manager will remain in Manual (Non-Automatic) for the entire period regardless of the wildfire risk.

² During the non-winter months, when an Auto-Recloser, Switch, or Fuse TripSaver that was placed in “Manual” due to the above policy trips open, the affected portions of the de-energized circuit or feeder will be patrolled prior to re-energizing them. If the cause is likely known and the fire risk is “Green” or “Yellow,” the Field Operations Supervisor may authorize the Line Crew to test the device once. If the device trips open again, the circuit or feeder must be thoroughly patrolled to determine the fault and ensure there is no risk to causing fire.

³ No patrol is required. Re-test allowed following check of fault indicators, SCADA, other system indicators, and reports from the field. If the re-test fails, a patrol is mandatory.

⁴ Normally only energized during winter period. If must be de-energized during winter period due to high risk conditions, and load is beyond the capability of the Lucerne supply lines plus the BVPP capacity, then reduce interruptible customer load as needed.

⁵ May be energized if forecasted and actual sustained wind and wind gust conditions are less than 40 mph and the Radford Line is required to meet load demand or the support load due to loss of other power sources or due to planned maintenance

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when the benefits of the maintenance will overall reduce the risk of wildfire. In all of these cases, the Utility Manger will approve energizing the Radford Line and will inform the President.

⁶The Utility Manager may initiate PSPS if in his judgement the actual conditions in the field pose a significant safety risk to the public.

4.8. Public Safety Power Shutoff (PSPS) Consideration. Based on the evaluation of BVES's potentially weakest overhead facilities, BVES has determined that specific actions per Table 4-4 above should be taken when wind gusts of 3 seconds or more exceed 55 mph and a period of high fire threat danger exists. These conditions are often referred to as "extreme fire threat weather and conditions." This action is designed to satisfy GO-166 Standard 1.E requirements.

4.8.1. Despite having a proactive and aggressive vegetation management program, vegetation may still contact power lines; for example, in high winds, branches outside the vegetation clearance zone may break and be blown onto bare conductors and/or trees outside the clearance zone may fall into bare conductors. The specific strength of trees and branches is unknown; therefore, in high winds, it is impossible to predict how every tree and branch in the service territory would be impacted. This condition plays a key role how BVES has selected its tripwire 3-second wind gust speed for PSPS and designated certain locations as "at risk" locations for proactive de-energization during extreme fire weather conditions.

4.8.1.1. Changes in vegetation density, circuit improvements such as conversion from overhead to underground, or other environmental factors may drive BVES to re-evaluate the designated "at risk" line sections in its system and, therefore, specific line sections may be added, removed or modified to the "at risk" list as appropriate in the future.

4.8.1.2. It should be noted that while BVES is able to evaluate its facilities and determine the limiting wind speeds when distribution facilities are possibly at high risk, BVES is not able to determine the strength or health of vegetation surrounding bare conductors outside of the required vegetation clearance zones as well as other structures that may come loose and impact BVES distribution facilities. Therefore, BVES may determine a need to proactively de-energize facilities during high fire threat and high wind conditions. This would be done in close consult and coordination with local government and agencies.

4.8.1.3. In determining whether to invoke PSPS, BVES staff considers a number of factors affecting whether or not "extreme fire weather and threat conditions" exist including the following:

- Design strength and other characteristics of distribution overhead facilities.
- Vegetation density.
- National Fire Danger Rating System (NFDRS) for 7-day fire threat outlook.
- National Weather Service advisories.
- Local weather forecasts and advisories.
- BVES meteorologist's forecast.

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- Information from BVES installed weather stations.
- Real-time information from trained personnel positioned in high-risk areas.
- Input from state and local authorities and Emergency Management Personnel.

“Extreme fire weather conditions” are deemed to be forecasted or exist when the National Fire Danger Rating System forecast is “red,” “orange,” or “brown” for area SC-10, high winds (45 mph or greater) are forecasted or measured, and the BVES meteorologist forecasts high fire threat conditions.

Once it is determined that “extreme fire weather conditions” are forecasted or exist, BVES Staff will implement BVES Public Safety Power Shutoff Procedures per Section 4 at the direction of the Utility Manager.

4.8.1.4. BVES has identified seven sections of “at risk” areas based on the type of distribution facilities (overhead bare conductions, high voltage, etc.), tree and vegetation density, available dry fuel, and other factors that make certain locations more vulnerable to wildfire risk. As previously stated, BVES’s entire service area is in the High Fire Threat District (HFTD) Tiers 2 and 3. The “at risk” areas are identified shown in Appendix A map. These areas may be selectively de-energized by “opening” the Auto-Reclosers (AR) designated in Table 4-5, Switches to De-energize “At Risk” Areas, below.

Table 4-5: Switches to De-energize “At Risk” Areas

Circuit (AR To Be Opened)	Number of Customers
Radford 34kV	0 ¹
North Shore 4kV (Open AR) 805)	1021
Erwin 4 kV (Open AR 1128)	197
Boulder 4kV (Open AR 105)	1063
Lagonita 4kV (Open AR 145)	946
Club View 4kV (Open AR 424)	740
Goldmine 4kV (Open AR 405)	950

¹Load is shifted to Shay 34kV line.

It is expected that if PSPS is necessary, in most cases it would be limited to one or more of these “high risk” areas. However, the Operations Team must monitor the entire service area and invoke PSPS as a measure of last resort on any BVES circuit when condition warrant such action.

4.9. **Restoration from PSPS.** When wind speeds in the affected area where PSPS was invoked calm below 50 mph for a minimum period of 20 minutes, crews may assess the fire weather conditions have subsided to “safe levels.” However, the crews may extend the calm period beyond 20 minutes, if they assess that further gusts of greater than 50 mph are likely based on their direct observation of local conditions or forecasts indicate a high probability of winds picking up to greater than 50 mph. Crews should communicate with the Field Operations

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Supervisor prior to assessing the situation as “safe levels” so that an evaluation of actual conditions in the field may be merged with the latest forecasted information. Restoration activities include:

- Validating that the extreme fire weather conditions have subsided to safe levels.
- Conducting field inspections and patrols of facilities that were de-energized.
- Re-energization of inspected (and repaired if necessary) circuits.

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5. BVES PSPS Procedures

5.1. **Emergency Response Plan.** Section 4 to the BVES Emergency Response Plan provides an explanation of the BVES system sources of power and actions to be taken when there is partial or complete loss of sources of power. Appendix B to this Plan provides a graphic showing the sources of power available to the BVES system including the SCE supply lines and their capacity. This PSPS Plan provides supplemental guidance in the case of SCE PSPS events that result in a complete or partial loss of all SCE lines in order to avoid a “black start” of the Bear Valley Power Plant (BVPP). Once PSPS is implemented, outages shall be managed using the guidance of the BVES Emergency Response Plan and the supplemental guidance of this procedure.

5.2. **PSPS Phases.** Table 5-1, PSPS Phases for PSPS Procedures, provides a time-line summary of actions to be taken for PSPS on BVES owned bare wire overhead power lines in some or all areas of the BVES service area and/or SCE directed PSPS affecting the BVES service area. It should be noted that weather changes can be sudden and the target timelines may end up being shorter than indicated in Table 5-1. PSPS actions are to be driven by forecasts and actual conditions in the field. The specific phases are:

- **Preparatory Phase:** Conducted annually well before extreme fire threat conditions are expected; or when lessons learned or other conditions warrant updating plans, training, and/or outreach. Develop communication and notification plans jointly with CalOES, county and local governments, independent living centers, and representatives of people/communities with AFN. Create a plan for CRC(s).
- **Warning Phase:** Starts 4-7 days prior to forecasted extreme fire threat weather and conditions. Mainly involves preparing to conduct PSPS when it is warranted and notifying local government, agencies, partner organizations, and customers. This phase includes various levels of notification at the 4-7 days ahead, 4 days ahead, 2-3 days ahead, 1-2 days ahead, and 1-4 hours ahead (PSPS imminent) points in the preparatory process.
- **Implementation Phase:** Involves de-energizing “at-risk” areas due to verified actual extreme fire threat weather and conditions and/or responding to SCE directed PSPS of SCE supply lines to BVES service area.
- **Restoration Phase:** Involves restoring power to de-energized circuits following verification that actual extreme fire threat weather and conditions have subsided and/or restoring SCE supply lines when they are re-energized.
- **Reporting and Lessons Learned Phase:** Documenting and reporting to Safety Enforcement Division required information on the PSPS event and capturing lessons learned to ensure future PSPS events benefit from an understanding of what worked and what did not work in previous PSPS events.

5.3. **PSPS Procedures.** Section 4 (Fire Prevention) provides the operational guidance on actions to be taken to mitigate the risk of fire. PSPS is a ***measure of last***

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resort after all other fire prevention measures have been implemented. The drivers leading to the decision to de-energize BVES circuits are provided in Section 4 as well as those to restore from PSPS.

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Table 5-1: PSPS Phases for PSPS Procedures

Phase	Timeframe	Internal Staff Actions	External Communications and Notifications
Preparatory	<p>Pre-fire season.</p> <ul style="list-style-type: none"> • Conducted annually well before extreme fire threat conditions are expected; or • When lessons learned or other conditions warrant updating plans, training, and/or outreach. • Coordinate with the CPUC, CalFire, CalOES, communications providers, representatives of people/communities with access and functional needs, and other public safety partners to plan de-energization simulation exercises throughout the utility service territories in the areas with the highest historical and forecasted risk for de-energization in advance of fire season. 	<p>Planning and Training</p> <ul style="list-style-type: none"> • Managers review and update plans and procedures. • Managers ensure staff are trained on PSPS procedures as applicable. • Reach out to media and Community-based organizations to ensure consistent awareness of and availability to third-parties of all messaging and map data, including application programming interfaces, that are used for de-energizations events. • Customer Service Department will ensure all equipment and supplies for the CRC are functional and readily available. 	<p>Local Government, Agencies, and Partner Organizations:</p> <ul style="list-style-type: none"> • Provide copy of plan and solicit comments. • Incorporate comments as deemed appropriate. • Conduct meetings to discuss procedures. • Update primary and secondary contacts for PSPS communications. • Advisory Board: May consist of public safety partners, communications and water service providers, local and tribal government officials, business groups, non-profits, representatives of people/communities with access and functional needs and vulnerable communities, and academic organizations. <p>Customer Outreach and Education:</p> <ul style="list-style-type: none"> • Post PSPS information on BVES’s Website and social media. • Include PSPS information in periodic customer newsletter. • Conduct public workshops. • Provide PSPS notifications via email, telephone calls, Interactive Voice Response (IVR) proactive calling system, and two-way text messaging.
Warning	<p>4-7 Days Ahead (Forecasts indicate extreme fire threat weather and conditions may occur)</p>	<p>Operations & Planning:</p> <ul style="list-style-type: none"> • Evaluate possible impacted area(s) and ensure resources ready to support PSPS. • Contact SCE Staff and maintain status of SCE supply lines. • Review operational and maintenance status of sub-transmission system. • Review operational and maintenance status of Bear Valley Power Plant (BVPP). • Review operational and maintenance status of Radford Line. • Consider conducting patrol of Radford Line. • Review National Weather Service (NWS) forecasts, National Fire Danger Rating System (NFDRS) 7-day 	None

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		<p>forecast, and weather and threat assessments from contracted meteorology consultant.</p> <ul style="list-style-type: none"> Consider having meteorology consultant provide more frequent forecasts. Alert customer service to possibility of PSPS. <p>Customer Service:</p> <ul style="list-style-type: none"> Review and edit as applicable templates for PSPS events and the anticipated impacts on BVES Customers. Staff drafts notices to Public Affairs consultant for review, significant changes to templates are made. Create warning notifications to customers via email, telephone calls, IVR proactive calling system, and two-way text messaging. 	
<p>Warning</p>	<p>4 Days Ahead (Continuing and consistent forecasts of extreme fire threat weather and conditions)</p>	<p>Operations & Planning:</p> <ul style="list-style-type: none"> Closely monitor fire weather alerts from various sources with the goal of refining the forecast (NWS, NFDRS, and meteorology consultant weather and threat assessments). Contact SCE Staff and maintain status of SCE supply lines. If any SCE lines are under “PSPS Consideration,” take actions per Table 4-2, BVES Action for SCE Lines Under PSPS Consideration. Ensure sub-transmission system is in most reliable condition. Defer and/or secure from planned maintenance. Ensure BVPP ready to operate. Defer and/or secure from planned maintenance. Alert Energy Resource Department of possible extended BVPP operations. Consider energizing Radford Line, if deemed necessary for reliability. Closely coordinate with SCE Staff regarding the PSPS status of SCE supply lines (Doble, Cushenberry, and Bear Valley/Radford). Ensure BVES installed weather stations fully operational. Ensure circuit load monitoring equipment fully operational. Place BVES staff incident responders on alert. <p>Customer Service:</p> <ul style="list-style-type: none"> Finalize “4 Day Alert” email regarding continuing and consistent forecasted extreme fire threat weather and conditions, which may lead to possible BVES directed 	<p>Local Government, Agencies, and Partner Organizations:</p> <ul style="list-style-type: none"> Email “4 Day Alert” to local government, agencies, and partner organizations primary and secondary points of contact. Alert the emergency management community, first responders and local government first.

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		<p>PSPS and/or SCE directed PSPS. Also, provide anticipated impacts on BVES Customers and direction of event. Obtain President's approval to release.</p> <ul style="list-style-type: none"> BVES will issue a press release to local media (newspaper and radio) and will post notification on website. Create warning notifications to customers via email, telephone calls, (IVR) proactive calling system, and two-way text messaging. 	
<p>Warning</p>	<p>2-3 Days Ahead (Extreme fire threat weather and conditions forecasted with increasing confidence)</p>	<p>Operations & Planning:</p> <ul style="list-style-type: none"> Continue to closely monitor fire weather alerts from various sources with the goal of refining the forecast (NWS, NFDRS, and meteorology consultant weather and threat assessments). Prepare staff rotation plans to support continuous field crew operations, BVPP operations, dispatch, and customer service. Evaluate need for additional resources from mutual aid agreements (CUEA and MMAA) and contracted services. Alert additional resources points of contact. Set up processes to frequently monitor BVES installed weather stations. Review pre-approved field Switching Orders against current system line-up and make changes as applicable with Field Operations Supervisor's approval. Keep Customer Service informed of latest forecast to ensure accurate communications with stakeholders. Closely coordinate with SCE Staff regarding SCE supply lines to the BVES service area and take actions per Table 4-2, BVES Action for SCE Lines Under PSPS Watch, as applicable. <p>Customer Service:</p> <ul style="list-style-type: none"> Finalize "2-3-Day Notice" regarding forecasted extreme fire threat weather and conditions, which may lead to possible BVES directed PSPS and/or SCE directed PSPS. Also, provides anticipated impacts on BVES Customers and direction of event. Obtain President's approval to release. BVES will issue a press release to local media (newspaper and radio) and will post notification on website. Create warning notifications to customers via email, telephone calls, (IVR) proactive calling system, and two-way text messaging. 	<p>Local Government, Agencies, and Partner Organizations:</p> <ul style="list-style-type: none"> Email "2-3 Day Notice" to local government, agencies, and partner organizations primary and secondary points of contact. Coordinate with the emergency management community, first responders and local government first. Encourage widest dissemination of this information. <p>Customer Outreach:</p> <ul style="list-style-type: none"> Post "2-3 Day Notice" on BVES website and social media. Issue "2-3 Day Notice" press release for local media. Send out "2-3 Day Notice" via IVR. Send out "2-3 Day Notice" via Text Send out "2-3 day Notice" via Email

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<p>Warning</p>	<p>1-2 Days Ahead (Extreme fire threat weather and conditions forecasted with high degree of confidence)</p>	<p>Operations & Planning:</p> <ul style="list-style-type: none"> • Continue to closely monitor fire weather alerts from various sources with the goal of refining the forecast (NWS, NFDRS, and meteorology consultant weather and threat assessments). • If needed, request additional resources from mutual aid agreements (CUEA and MMAA) and contracted services). • Monitor BVES installed weather stations on a frequent basis. • Keep Customer Service informed of latest forecast to ensure accurate communications with stakeholders. <ul style="list-style-type: none"> ○ Set up CRC and conduct a mock SOE scenario to include testing of all equipment and needed supplies. ○ Purchase non-perishable food items to provide to our customers including bottled water. • Continue to closely coordinate with SCE Staff regarding SCE supply lines to the BVES service area and take actions per Table 4-2, BVES Action for SCE Lines Under PSPS Watch, as applicable. • When directed by the Utility Manager: <ul style="list-style-type: none"> ○ Staff incident responders called in. ○ Incident dispatch established. ○ Field Crews dispatched to monitor various actual field conditions for extreme fire weather and other dangerous conditions throughout the service area and “at risk” areas. ○ Implement BVES ERP including staffing the EOC as applicable. <p>Customer Service:</p> <ul style="list-style-type: none"> • Finalize “1-2 Day Notice” regarding imminent extreme fire threat weather and conditions, which may result in BVES directed PSPS and/or SCE directed PSPS. Also, provides anticipated impacts on BVES Customers and duration of event. Obtain President’s approval to release. • Update list of medical baseline customers that may lose power as result of PSPS. • Update list of AFN customers that may lose power as result of PSPS. • BVES will issue a press release to local media (newspaper and radio) and will post notification on website. 	<p>Local Government, Agencies, and Partner Organizations:</p> <ul style="list-style-type: none"> • Email “1-2 Day Notice” to local government, agencies, and partner organizations primary and secondary points of contact. • Coordinate with the emergency management community, first responders and local government first. • Encourage widest dissemination of this information. <p>Customer Outreach:</p> <ul style="list-style-type: none"> • Post “1-2 Day Notice” on BVES website and social media. • Issue “1-2 Day Notice” press release for local media. • Send out “1-2 Day Notice” via IVR. • Send out “1-2 Day Notice” via Text • Activate “1-2 day Notice” via Email
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		<ul style="list-style-type: none"> Create warning notifications to customers via email, telephone calls, (IVR) proactive calling system, and two-way text messaging 	
Warning	<p>1-4 Hours Ahead When De-Energization Imminent. (Extreme fire threat weather and conditions validated by field resources)</p>	<p>Operations & Planning:</p> <ul style="list-style-type: none"> Closely coordinate with SCE regarding SCE directed PSPS that affect SCE lines into BVES service area and take applicable actions per Table 4-3, BVES Action for SCE Lines De-energized Due to PSPS. Field Operations staff frequently monitor BVES installed weather stations. Field Crews patrol throughout service area and the “at risk” areas to monitor various actual field conditions for extreme fire weather and other dangerous conditions. Field Crews monitor local wind gusts in “at-risk” areas. <p>Customer Service:</p> <ul style="list-style-type: none"> Finalize “De-energization Imminent Notice” regarding extreme fire threat weather and conditions validated by field resources and actual PSPS de-energization(s) directed by BVES and/or SCE and includes areas de-energized, number of customers without power, and best estimated time to restore (ETR). Obtain President’s approval to release. Refine lists of medical baseline customers without power. Update list of AFN customers that may lose power as result of PSPS BVES will issue a press release to local media (newspaper and radio) and will post notification on website. Create warning notifications to customers via email, telephone calls, (IVR) proactive calling system, and two way text messaging. 	<p>Local Government, Agencies, and Partner Organizations:</p> <ul style="list-style-type: none"> Email “De-energization Imminent Notice” to local government, agencies, and partner organizations. Coordinate with the emergency management community, first responders, and local government in managing outages due to PSPS. Provide list of customers that may be without power and listed as medical baseline customers to Sheriff Department and Fire Department. Encourage widest dissemination of this information. <p>Customer Outreach:</p> <ul style="list-style-type: none"> Post “De-energization Imminent Notice” on BVES website and social media. Issue “De-energization Imminent Notice” press releases for local media. Send out “De-energization Imminent Notice” via IVR. Send out “De-energization Imminent Notice Day Notice” via Text Send out “De-energization Imminent Notice” via Email
Implementation	<p>During de-energization event. (Extreme fire threat weather and conditions validated by field resources)</p>	<p>Operations & Planning:</p> <ul style="list-style-type: none"> Closely coordinate with SCE regarding SCE directed PSPS that affect SCE lines into BVES service area and take applicable actions per Table 4-3, BVES Action for SCE Lines De-energized Due to PSPS. Field Operations staff frequently monitor BVES installed weather stations. Field Crews patrol throughout service area and the “at risk” areas to monitor various actual field conditions for extreme fire weather and other dangerous conditions. Field Crews monitor local wind gusts in “at-risk” areas. 	<p>Local Government, Agencies, and Partner Organizations:</p> <ul style="list-style-type: none"> Email “De-energization Notice” to local government, agencies, and partner organizations. Coordinate with the emergency management community, first responders, and local government in managing outages due to PSPS. Send “De-energization Updates” on the PSPS. Provide list of customers without power and listed as medical baseline and AFN customers to Sheriff Department and Fire Department. Encourage widest dissemination of this information.

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		<ul style="list-style-type: none"> Field Crews de-energize circuits in “at risk” areas as wind gusts reach threshold for de-energization as designated by Field Operations Supervisor. Field Crews may de-energize additional power lines they evaluate as posing a public safety hazard and/or as directed by Field Operations Supervisor. Prepare GO-166 major outage and ESRB-8 notifications as applicable. <p>Customer Service:</p> <ul style="list-style-type: none"> Finalize “De-energization Notice” regarding extreme fire threat weather and conditions validated by field resources and actual PSPS de-energization(s) directed by BVES and/or SCE and includes areas de-energized, number of customers without power, and best estimated time to restore (ETR). Obtain President’s approval to release. Finalize “De-energization Updates” providing status changes such as when the number of customers without power and/or ETR(s) change significantly. Obtain President’s approval to release. Refine lists of medical baseline customers without power. ES will issue a press release to local media (newspaper and radio) and will post notification on website. Issue warning notifications to customers via email, telephone calls, (IVR) proactive calling system, and two-way text messaging. 	<ul style="list-style-type: none"> Notify California Public Utilities Commission (CPUC) and Warning Center at the Office of Emergency Services San Bernardino within one hour of shutting off the power if the outage meets the major outage criteria of GO-166. Notify President Safety Enforcement Division (SED), CPUC within twelve hours of the power being Shutoff per ESRB-8. <p>Customer Outreach:</p> <ul style="list-style-type: none"> Post “De-energization Notice” and “De-energization Updates” (when warranted) on BVES website and social media. Issue “De-energization Notice” and “De-energization Updates” (when warranted) press releases for local media. Send out “De-energization Notice” and “De-energization Updates” (when warranted) via IVR. Send out “De-energization Notice” and “De-energization Updates” (when warranted) via Text Activate “De-energization Notice” and “De-energization Updates” (when warranted) via Email Communicate with emergency services regarding AFN and medical baseline customers.
<p>Restoration</p>	<p>Re-energization (Extreme fire conditions subside to safe levels as validated by field conditions)</p>	<p>Operations & Planning:</p> <ul style="list-style-type: none"> Field Crews validate that the extreme fire weather conditions have subsided to safe levels as designated by the Field Operations Supervisor and report these conditions to Dispatch. Field Crews conduct field inspections and patrols of facilities that were de-energized. When field inspections and patrols are completed satisfactorily, power is restored to the affected circuits. As SCE restores supply lines, Field Crews conduct switching operations as directed by Field Operations Supervisor to restore systems normal. <p>Customer Service:</p> <ul style="list-style-type: none"> Finalize “Intent to Restore” notice to include ETR(s) and obtain President’s approval to release. 	<p>Local Government, Agencies, and Partner Organizations:</p> <ul style="list-style-type: none"> Send “Intent to Restore” notice to local government, agencies, and partner organizations. Encourage widest dissemination of this information. Coordinate with the emergency management community, first responders, and local government in managing restorations. Send “Restoration Complete” notice to local government, agencies, and partner organizations once power is fully restored or an update if restoration is delayed. <p>Customer Outreach:</p> <ul style="list-style-type: none"> Post “Intent to Restore” notice on BVES website and social media. Issue “Intent to Restore” press release for local media.

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		<ul style="list-style-type: none"> Finalize "Restoration Complete" notice to be issued when power is fully restored and obtain President's approval to release. Breakdown of CRC including removal/storage of all equipment and supplies. 	<ul style="list-style-type: none"> Send out "Intent to Restore" notice via IVR. Send out "Intent to Restore" notice via Text Send out "Intent to Restore" notice via Email Post "Restoration Complete" notice on BVES website and social media once power is fully restored or an update if restoration is delayed. Issue "Restoration Complete" press release for local media once power is fully restored or an update if restoration is delayed. Send out "Restoration Complete" notice via IVR once power is fully restored or an update if restoration is delayed. Send out "Restoration Complete" notice via Text once power is fully restored or an update if restoration is delayed. Send out "Restoration Complete" notice via Email once power is fully restored or an update if restoration is delayed.
Reporting and Lessons Learned	Post Event	Operations & Planning: <ul style="list-style-type: none"> Utility Manager conduct lessons learned with applicable staff. Include Customer Service and solicit input from Local Government, Agencies, and Partner Organizations. If applicable, update plan and procedures per the lessons learned. Prepare PSPS Post Event Report required by ESRB-8 and forward to President and Manager Regulatory Affairs for approval. 	CPUC Safety Enforcement Division: <ul style="list-style-type: none"> File a report (written) to President of SED no later than 10 business days after the Shutoff event ends per ESRB-8.

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5.4. **SCE Directed PSPS Procedures.** Close coordination with SCE is essential to mitigating the impact of any SCE directed PSPS events that would result in a complete and/or partial loss of SCE supply lines. The following preparatory coordination has been established:

- Each year, before the fire season, BVES Management Team will engage SCE Management on coordination for potential and actual PSPS events.
- BVES Management Team will update contact information with the SCE Key Account Manager for the BVES account.
- BVES Field Operations staff will update contact information with the SCE Lugo and Colton Control Stations which have direct operational control over the SCE supply lines to BVES.

When PSPS events are forecasted and/or implemented, the SCE Key Account Manager will coordinate with the BVES Management Team and the SCE Lugo and Colton Control Stations will coordinate directly with the designated BVES Field Operations Team.

Table 5-2, BVES Action for SCE Lines Under PSPS Consideration, provides procedures to implement to best prepare the BVES system for a complete and/or partial loss of SCE supply lines.

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Table 5-2: BVES Action for SCE Lines Under PSPS Consideration	
Condition	BVES Action
SCE places Doble or Cushenberry Line under PSPS Consideration.	<ol style="list-style-type: none"> 1. Notify key internal staff and brief Field Operations staff on condition for situational awareness. 2. Operations & Planning Manager evaluate energizing Radford Line for improved reliability.
SCE places Bear Valley Line under PSPS Consideration.	<ol style="list-style-type: none"> 1. Notify key internal staff and brief Field Operations staff on condition for situational awareness. 2. If Radford is energized, shift loads to Shay Line.
SCE places Doble and Cushenberry Lines under PSPS Consideration.	<ol style="list-style-type: none"> 1. Notify key internal staff and brief Field Operations staff on condition for situational awareness. 2. Energize the Radford Line. 3. Prepare for potentially losing all SCE supply lines from Lucerne. 4. Prepare for sustained BVPP operations and rolling blackouts. 5. Evaluate distribution circuit loads.
SCE places Doble or Cushenberry, and Bear Valley Lines under PSPS Consideration	<ol style="list-style-type: none"> 1. Notify key internal staff and brief Field Operations staff on condition for situational awareness. 2. Prepare for potentially losing all SCE supply lines from Lucerne. 3. Prepare for sustained BVPP operations and rolling blackouts. 4. Evaluate distribution circuit loads.
SCE places Doble, Cushenberry, and Bear Valley Lines under PSPS Consideration	<ol style="list-style-type: none"> 1. Notify key internal staff and brief Field Operations staff on condition for situational awareness. 2. Prepare for potentially losing all SCE supply lines into BVES service area. 3. Prepare for sustained BVPP operations and rolling blackouts. 4. Evaluate distribution circuit loads.

Table 5-3, BVES Action for SCE Lines De-energized Due to PSPS, provides procedures to use in the event of a partial or complete loss of SCE supply lines due to PSPS. These procedures are based on procedures specified in Section 4 to the BVES Emergency Response Plan except that they take into account that BVES will closely coordinate with SCE Staff as follows:

- BVES will receive warnings of impending PSPS on the SCE lines about 2 days prior to the event.
- BVES will receive updates to the status of the lines under PSPS Consideration.
- SCE will notify BVES at least 4 hours prior to de-energizing any SCE supply lines to BVES service area.

These timely notifications will allow BVES to take preparatory action to shed load to within the expected capacity of its remaining sources of power and will allow BVES to avoid a “black start” on the BVPP. Therefore, the procedures of Table 5-3 should be followed during PSPS event. However, if there is a sudden complete or partial loss of

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SCE supply lines, the procedures in Section 4 of the BVES Emergency Response Plan are more appropriate and should be followed as directed by the Utility Manager.

Table 5-3: BVES Action for SCE Lines De-energized Due to PSPS

Condition	BVES Action
SCE De-energizes Doble or Cushenberry Line for PSPS.	<ol style="list-style-type: none"> 1. Notify key internal staff and brief Field Operations staff on condition for situational awareness. 2. Energize Radford Line as needed to meet load demand. If the Utility Manager deems it necessary, energize the Radford Line as needed for reliability. 3. Startup of the BVPP as needed to meet load demand. 4. No reduction on load necessary, since the Doble and Cushenberry are capable of carrying the other's load. 5. Implement applicable portions of BVES Emergency Response Plan for a partial loss of SCE supply lines.
SCE De-energizes Bear Valley Line for PSPS.	<ol style="list-style-type: none"> 1. Notify key internal staff and brief Field Operations staff on condition for situational awareness. 2. If Radford is energized, shift loads to Shay Line prior to de-energizing for PSPS. Generally, this should be done about 4 hours prior to the SCE de-energizing the line. 3. If needed, start up the BVPP to meet load demand. 4. If needed, instruct interruptible customers (Bear Mountain Resorts) to reduce load as needed to meet load demand. 5. Implement applicable portions of BVES Emergency Response Plan for a partial loss of SCE supply lines.
SCE De-energizes Doble or Cushenberry and Bear Valley Lines for PSPS.	<ol style="list-style-type: none"> 1. Notify key internal staff and brief Field Operations staff on condition for situational awareness. 2. Since the Doble and Cushenberry are capable of carrying the other's load, follow the procedure for "SCE De-energizes Bear Valley Line for PSPS" above. 3. Prepare for potentially losing all SCE supply lines into BVES service area. 4. Prepare for sustained BVPP operations and rolling blackouts. 5. Evaluate distribution circuit loads. 6. Implement applicable portions of BVES Emergency Response Plan for a partial loss of SCE supply lines.
SCE De-energizes Doble and Cushenberry Lines for PSPS.	<ol style="list-style-type: none"> 1. Notify key internal staff and brief Field Operations staff on condition for situational awareness. 2. If not already done, energize the Radford Line. 3. Four hours prior to SCE de-energizing the lines, per the Field Operations Supervisor's direction, shift as much of the load to the BVPP and Radford Line as follows: <ol style="list-style-type: none"> a. Open the Shay and Baldwin ARs. b. "Express" the Radford Line to Meadow Substation without overloading the Radford Line per Field Operations' switching order. c. Start up the BVPP, place enginators on-line and increase load to within the combined capacity of the BVPP and Radford Line.

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Table 5-3: BVES Action for SCE Lines De-energized Due to PSPS

Condition	BVES Action
	<ul style="list-style-type: none"> d. Implement BVES Emergency Response Plan for sustained loss of SCE supplies from Lucerne including “rolling blackout” procedures. 4. Prepare for sustained BVPP operations and rolling blackouts. 5. Frequently monitor distribution circuit loads.
<p>SCE de-energizes Doble, Cushenberry, and Bear Valley Lines for PSPS.</p>	<ul style="list-style-type: none"> 1. Notify key internal staff and brief Field Operations staff on condition for situational awareness. 2. If the Radford Line is energized, shift loads to the Shay Line. 3. Four hours prior to SCE de-energizing the lines, per the Field Operations Supervisor’s direction, perform the following: <ul style="list-style-type: none"> a. Start up all of the BVPP enginators. b. Reduce system load to within the capacity of the BVPP by isolating distribution circuits as directed by the Field Operations Supervisor. c. Once system load is matched with the BVPP capacity, open the Shay and Baldwin ARs. d. Implement BVES Emergency Response Plan for sustained loss of all SCE supply lines including “rolling blackout” procedures.

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6. PSPS Public Outreach and Communications

6.1. Importance of Public Outreach. Due to the significant impact that a PSPS event may have on the community and customers, it is essential that early and accurate communications be conducted throughout the PSPS event coincides with local government, agencies, partner organizations (includes emergency management community and first responders, CALOES, county and local governments, independent living centers, and representatives of people/communities with access and functional needs), and customers. Effective communications are key to allow stakeholders to take preparatory actions that will mitigate the impact of a PSPS event on them.

6.2. ERP Communications Procedures. During the time period leading up to the PSPS event, during a PSPS event, and during the restoration period from a PSPS event, the Emergency Response Communications Plan (Section 5) of the Emergency Response Plan (ERP) shall be implemented as applicable in conjunction with this plan.

6.3. PSPS Planned Communications. Table 6-1, BVES PSPS Communications Template Listing, are to be prepared by the Customer Program Specialist and be preapproved through the President well ahead of expected PSPS events such that BVES staff may quickly initiate effective communications with stakeholders during a PSPS event. The templates are designed to provide a standard “fill in the blank” notice that may be amended depending on the specific situation as applicable. Templates shall initially be reviewed and edited as applicable by BVES’s public relations contractor. Additionally, the templates shall be reviewed annually and/or when lessons learned indicate changes to the templates are appropriate.

Table 6-1: BVES PSPS Communications Template Listing

Template	Content	Media	Recipients
4-Day Alert	Provides notice of continuing and consistent forecasted extreme fire threat weather and conditions, which may lead to possible BVES directed PSPS and/or SCE directed PSPS. Also, provides anticipated impacts on BVES Customers and direction of event.	<ul style="list-style-type: none"> Email 	<ul style="list-style-type: none"> Local Government, Agencies, and Partner Organizations (Includes emergency management community and first responders, CALOES, county and local governments, independent living centers, and representatives of people/communities with access and function needs), and customers (including medical baseline and behind-the-meter).

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Table 6-1: BVES PSPS Communications Template Listing

Template	Content	Media	Recipients
2-3 Day Notice	<p>Provides notice of forecasted extreme fire threat weather and conditions, which may lead to possible BVES directed PSPS and/or SCE directed PSPS. Provides anticipated impacts on BVES Customers and duration of event.</p>	<ul style="list-style-type: none"> • Email • BVES Website • Social Media • Press Release • IVR Message • Text Message 	<ul style="list-style-type: none"> • Local Government, Agencies, and Partner Organizations (Includes emergency management community and first responders, CALOES, county and local governments, independent living centers, and representatives of people/communities with access and function needs) and customers (including medical baseline and behind-the-meter).
1-2 Day Notice	<p>Provides notice regarding imminent extreme fire threat weather and conditions, which may result in BVES directed PSPS and/or SCE directed PSPS. Also, provides anticipated impacts on BVES Customers and duration of event.</p>	<ul style="list-style-type: none"> • Email • BVES Website • Social Media • Press Release • IVR Message • Text Message 	<ul style="list-style-type: none"> • Local Government, Agencies, and Partner Organizations (Includes emergency management community and first responders, CALOES, county and local governments, independent living centers, and representatives of people/communities with access and function needs) and customers (including medical baseline and behind-the-meter).
De-energization Imminent Notice	<p>Provides notice that BVES directed PSPS and/or SCE directed PSPS is imminent (within 1-4 hours) based on validated extreme fire threat weather and conditions. Also, provides anticipated impacts on BVES Customers and duration of event.</p>	<ul style="list-style-type: none"> • Email • BVES Website • Social Media • Press Release • IVR Message • Text Message 	<ul style="list-style-type: none"> • Local Government, Agencies, and Partner Organizations (Includes emergency management community and first responders, CALOES, county and local governments, independent living centers, and representatives of people/communities with access and function needs) and customers (including medical baseline and behind-the-meter).

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Table 6-1: BVES PSPS Communications Template Listing

Template	Content	Media	Recipients
De-energization Notice	Provides notice of extreme fire threat weather and conditions validated by field resources and actual PSPS de-energization(s) directed by BVES and/or SCE and includes areas de-energized, number of customers without power, and best estimated time to restore (ETR).	<ul style="list-style-type: none"> • Email • BVES Website • Social Media • Press Release • IVR Message • Text Message 	<ul style="list-style-type: none"> • Local Government, Agencies, and Partner Organizations (Includes emergency management community and first responders, CALOES, county and local governments, independent living centers, and representatives of people/communities with access and function needs) and customers (including medical baseline and behind-the-meter).
De-energization Updates	During de-energization event, provides notice of changes such as when the number of customers without power and/or ETR(s) changes significantly.	<ul style="list-style-type: none"> • Email • BVES Website • Social Media • Press Release • IVR Message • Text Message 	<ul style="list-style-type: none"> • Local Government, Agencies, and Partner Organizations (Includes emergency management community and first responders, CALOES, county and local governments, independent living centers, and representatives of people/communities with access and function needs) and customers (including medical baseline and behind-the-meter).
Intent to Restore	Provides notice that extreme fire threat weather and conditions have subsided, BVES crews are performing post-PSPS restoration inspections, and ETR(s).	<ul style="list-style-type: none"> • Email • BVES Website • Social Media • Press Release • IVR Message • Text Message 	<ul style="list-style-type: none"> • Local Government, Agencies, and Partner Organizations (Includes emergency management community and first responders, CALOES, county and local governments, independent living centers, and representatives of people/communities with access and function needs) and customers (including medical baseline and behind-the-meter).

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Table 6-1: BVES PSPS Communications Template Listing

Template	Content	Media	Recipients
Restoration Complete	Provides notice that power is fully restored.	<ul style="list-style-type: none"> • Email • BVES Website • Social Media • Press Release • IVR Message • Text Message 	<ul style="list-style-type: none"> • Local Government, Agencies, and Partner Organizations (Includes emergency management community and first responders, CALOES, county and local governments, independent living centers, and representatives of people/communities with access and function needs) and customers (including medical baseline and behind-the-meter).

6.4. Critical Facilities and Infrastructure. The term ‘critical facilities’ and ‘critical infrastructure’ refers to facilities and infrastructure that are essential to the public safety and that require additional assistance and advance planning to ensure resiliency during PSPS events. The following provides guidance on what constitutes critical facilities and infrastructure:

6.4.1. Emergency Services Sector

- Police Stations
- Fire Stations
- Emergency Operations Centers

6.4.2. Government Facilities Sector

- Schools
- Jails and prisons

6.4.3. Healthcare and Public Health Sector

- Public Health Departments
- Medical facilities, including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers and hospice facilities

6.4.4. Energy Sector: Public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, interconnected publicly-owned utilities.

6.4.5. Water and Wastewater Systems Sector: Facilities associated with the provision of drinking water or processing of wastewater including facilities used to pump, divert, transport, store, treat and deliver water or wastewater.

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6.4.6. Communications Sector: Communication carrier infrastructure including selective routers, central offices, head ends, cellular switches, remote terminals and cellular sites.

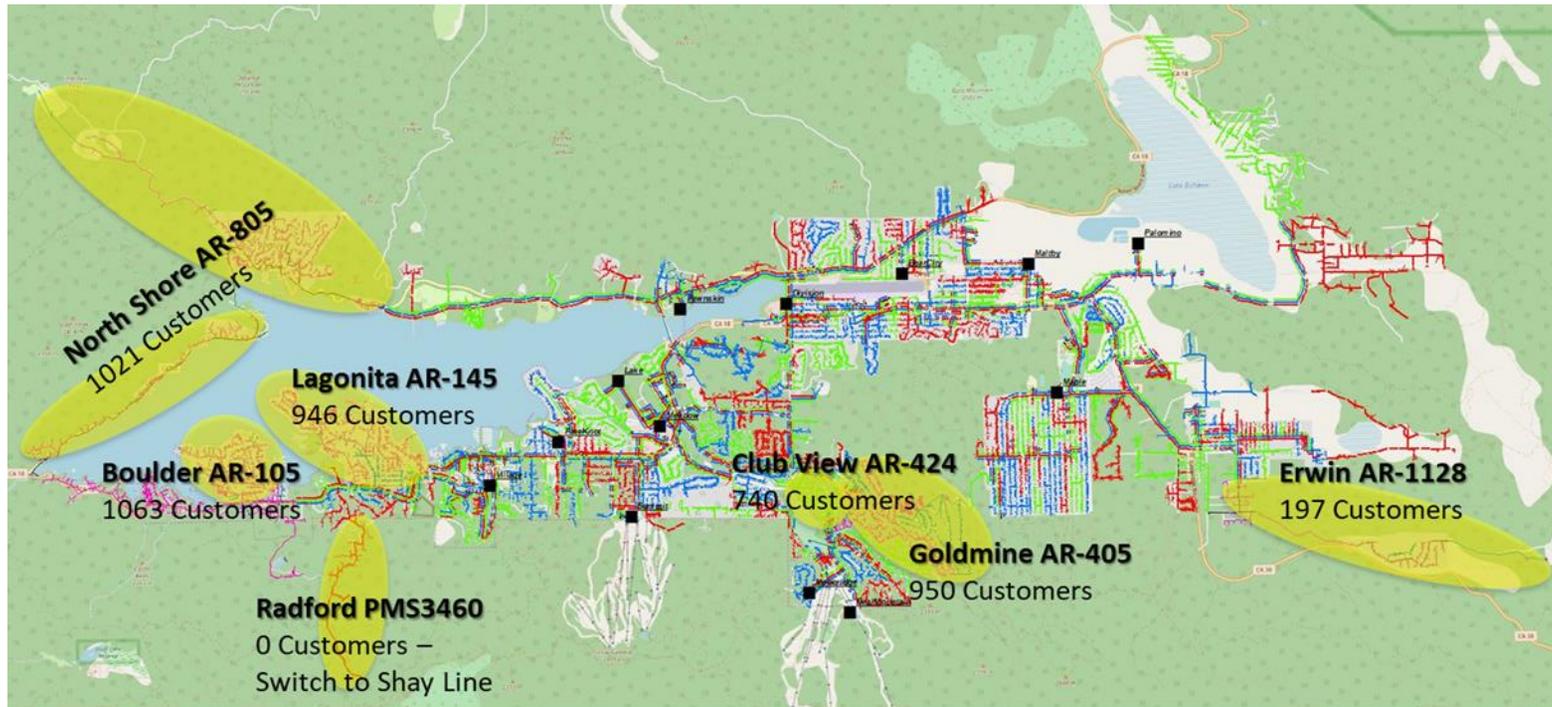
6.4.7. Chemical Sector: Facilities associated with the provision of manufacturing, maintaining, or distributing hazardous materials and chemicals.

6.5. **Key Partners.** The follow provides the list of pertinent Local Government, Agencies, and Partner Organizations to BVES PSPS notifications. This list overlaps with the list of what is considered critical facilities and infrastructure:

- Local officials (City of Big Bear Lake) and San Bernardino County)
- State officials (normally CPUC Energy Division and Safety Enforcement Division)
- San Bernardino County Office of Emergency Services (County OES)
- Big Bear Fire Department
- California Department of Forestry and Fire Protection (CAL FIRE)
- U.S. Forest Service
- San Bernardino County Sheriff's Department Big Bear Lake Patrol Station
- California Highway Patrol (CHP) Arrowhead Area
- California Department of Transportation (Caltrans)
- Big Bear Area Regional Wastewater Agency (BBARWA)
- Big Bear City Community Services District (CSD)
- Big Bear Lake Water Department (DWP)
- Big Bear Municipal Water District (MWD)
- Southwest Gas Corporation
- Bear Valley Community Hospital
- Bear Valley Unified School District
- Big Bear Chamber of Commerce
- Big Bear Airport District
- Big Bear Mountain Resorts
- Spectrum Communications
- Various cell tower providers

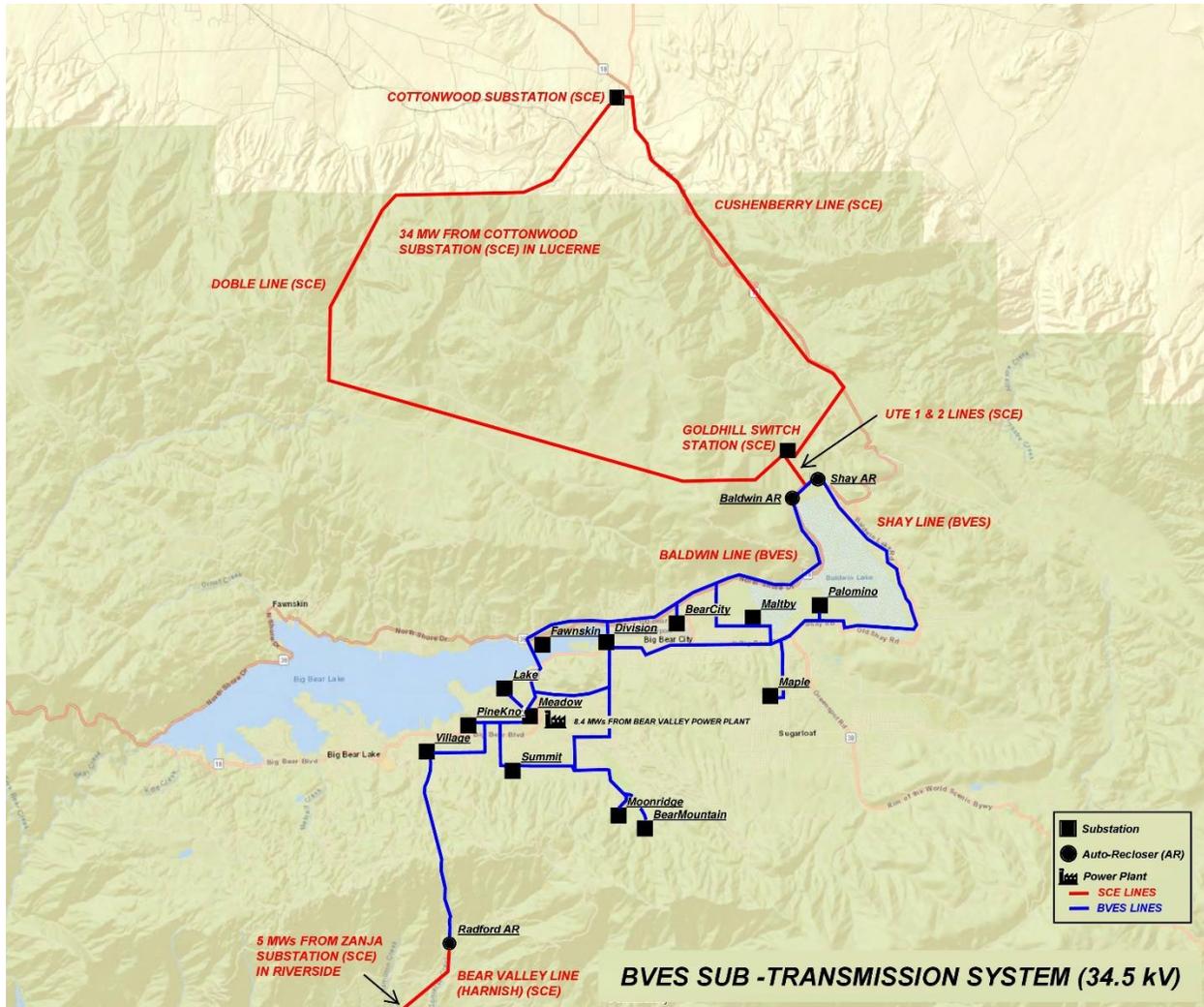
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Appendix A: BVES “High Risk Areas” for PSPS Consideration



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Appendix B: BVES Supply Lines, Sources of Power and Sub-Transmission System



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Appendix C: BVES Community Resource Center Protocols

1. During a PSPS event, Bear Valley Electric Service, Inc. will set up a Community Resource Center (CRC) at its Main Facility at 42020 Garstin Dr., Big Bear Lake, CA 92315 adjacent to the Warehouse. The Customer Service and Operations Support Supervisor shall be responsible for ensuring these protocols are properly implemented when the CRC is activated.
2. The CRC shall be operable from 8:00 a.m. to 10:00 p.m. during an active PSPS event. Actual hours of operation will be coordinated and determined by the local government in cases in which early closure of a facility is required due to inability to access a facility until 10:00 p.m.
3. The will initially be set up in the Warehouse so that quick access and set up may occur.
4. The setup of the CRC shall be ADA (Americans with Disabilities Act) accessible to meet the needs of people/communities with access and functional needs and medical baseline customers.
5. At all times the CRC shall comply with social distancing or other public health protocols that are in place.
6. The following supplies and equipment are stored in the CRC Storage Container to support CRC operations:
 - Tents (2)
 - Water
 - Snacks (such as crackers, granola bars, etc...)
 - Chairs
 - Heaters
 - Extension cords
 - Disposable masks (as necessary)
 - Gloves (as necessary)
 - Hand sanitizer (as necessary)
 - Flash lights
 - Small first aid kits
 - Blankets
 - Surge Protectors
 - Gas tank
 - Generators
 - Wireless internet access point
7. The CRC will operate as follows:

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- a. The Customer Service and Operations Support Supervisor and Customer Program Specialist will be in charge of the CRC.
 - b. The CRC will be set up and operated by:
 - Field personnel/warehouse person will set up and assist as needed
 - Customer Service and Operations Support Supervisor
 - Customer Program Specialist
 - c. Security and Access will be conducted by the Customer Service Representatives and Operations Support Specialists.
8. Customer Service Representatives will staff an Information Booth to provide customers the latest information regarding PSPS and services available to them.
 9. Medical Equipment Access (Generators/power supplies) will be provided for Customers who are on medical devices such as oxygen, etc.
 10. Access to Wi-Fi and back-up cell phones (as necessary) will be provided to Customers.
 11. Until portable restroom facilities are available, customers will have access to the Main Office restroom facilities.