



*Public Advocates Office*  
*California Public Utilities Commission*

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**PUBLIC ADVOCATES OFFICE DATA REQUEST**

**No. CalAdvocates-BVES-2022WMP-06**  
**Proceeding: 2022 Wildfire Mitigation Plans**

Date of issuance: Wednesday, May 18, 2022

Due date: Monday, May 23, 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.<sup>1</sup>

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](mailto:CalAdvocates.WildfireDiscovery@cpuc.ca.gov)
2. [Henry.Burton@cpuc.ca.gov](mailto:Henry.Burton@cpuc.ca.gov)
3. [Dillon.Copa@cpuc.ca.gov](mailto:Dillon.Copa@cpuc.ca.gov)
4. [Natalie.Monroe@cpuc.ca.gov](mailto:Natalie.Monroe@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.

**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

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<sup>1</sup> 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.

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 Advocate's Office employees listed on the cover page), including the Public Advocate's 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”).<sup>2</sup> 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.
  - P. “Non-HFTD” means areas that are not designated as HFTD according to the definition above.

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<sup>2</sup> As modified by Commission Decision 20-12-030.

- 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.

## **DATA REQUESTS**

### **Question 1**

On p. 67 of BVES’s Revised 2021 WMP, BVES provided a chart that forecasted 100% completion of the Radford Line Covered Conductor Replacement Project by the end of 2021.

Page 95 of BVES’s 2022 WMP states that BVES plans 100% completion of the Radford Line Covered Conductor Project in 2022. However, on p. 159, BVES states that the project may be deferred until 2023.

Please explain all factors that prevented BVES from completing this project in 2021 as indicated in the Revised 2021 WMP.

### **Question 2**

For the Radford Line Covered Conductor Project, please state the month and year that BVES *initiated*:

- a) Project planning
- b) Design and engineering
- c) Outreach to affected stakeholders (e.g., local and federal agencies of jurisdiction)
- d) Permitting
- e) Construction

### **Question 3**

For the Radford Line Covered Conductor Project, please state the month and year that BVES *completed or currently plans to complete*:

- a) Project planning
- b) Design and engineering
- c) Permitting
- d) Construction

### **Question 4**

BVES has deferred the Radford Line Covered Conductor Replacement Project several times:

- 2019 WMP, p. 23: Planned to complete Radford Line Covered Conductor Replacement Project in 2019, with possible deferral to 2020.
  - Revised 2020 WMP, p. 131: Estimated completion of the project in October 2021.
  - Revised 2021 WMP, p. 87: Project on track for completion in 2021.
  - 2022 WMP, pp. 95 and 159: Estimated completion in 2022, possible deferral to 2023.
- a) Please list all factors that have contributed to the deferral of the Radford Line Covered Conductor Project from the original plan to complete the project in 2019.
  - b) For each factor listed in response to part (a), please list the actions BVES has taken to mitigate these factors and prevent the project from being deferred to 2023.
  - c) Please list any factors that BVES anticipates may cause the *completion* of the Radford Line Covered Replacement Project to be deferred until *later than 2023*.
  - d) For each factor listed in response to part (c), please list the actions BVES has taken to mitigate these factors and prevent the project's completion from being deferred beyond 2023.

### **Question 5**

Table 12 of BVES's Revised 2021 WMP stated that BVES planned to remove 100 tree attachments in 2021 and 100 more in 2022.

P. 96 of BVES's 2022 WMP states that BVES's target number of tree attachments in 2021 was 70, and that BVES plans to remove 80 tree attachments in 2022.

- a) Please explain why BVES's 2022 WMP states a lower 2021 target for the Tree Attachment Removal Program than was stated in BVES's Revised 2021 WMP.
- b) Please explain the reason for the reduced number of tree attachments to be removed in 2022 compared to the forecast in BVES's Revised 2021 WMP.
- c) Both the Revised 2021 WMP and the 2022 WMP state that the Tree Attachment Removal Program will be complete by the end of 2026. Does BVES anticipate any difficulties in achieving this goal as a result of the reduced 2021 and 2022 targets?
- d) If the answer to part (c) is yes, please list the actions BVES plans to take in 2022 to mitigate such risk.

**END OF REQUEST**