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*California Public Utilities Commission*

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**PUBLIC ADVOCATES OFFICE DATA REQUEST**

**Proceeding: 2021 Wildfire Mitigation Plans**

**No. CalAdvocates-BVES-2021WMP-03**

Date: March 29, 2021

Response requested: April 1, 2021

To: **Paul Marconi**

Bear Valley Electric Service

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**Nguyen Quan**

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From: **Alan Wehrman**

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## INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5(e) and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each Data Request prior to providing the response. Identify the person providing the answer to each Data Request and their contact information.

Please send your response to the Originator and e-copies to the following Public Advocates Office representatives:

Henry.Burton@cpuc.ca.gov

Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Public Advocates Office as soon as possible, **at least** 2 days before the response to the Data Requests is due and provide your best estimate of when the information can be provided. Please identify the person who will be providing the response and their phone number and email address.

Responses should be provided in the original electronic format, if available, and if not available, 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 these Data Requests 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 Requests should be Bates-numbered and, if voluminous, indexed. Responses to Data Requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

For any questions, email the Public Advocates Office contact(s) above with a copy to the Public Advocates Office attorney. If you are unable to answer a question completely, accurately, and with the specificity requested, notify the Public Advocates Office **at least** 2 days before the response to the Data Requests is due. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

## DEFINITIONS

- A. As used herein, the terms "you," "your(s)," "Company," 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 these Data Requests 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 these Data Requests 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 these Data Requests.
- 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 these Data Requests.
- H. “Identify”:
  - i. When used in reference to a person, includes stating their full name, most recent known business address and telephone number, and present title or position;
  - ii. When used in reference to documents, includes stating the nature of the document (e.g., letter, memorandum), the date (if any), the title of the document, the identity of the author and/or the document, the location of the document, the identity of the person having possession, control or custody of the document, and the general subject matter 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, and analysis known to you which you believe to support the statement, or which you contend to be evidence of the truth or accuracy thereof.
- J. “WMP” means Wildfire Mitigation Plan.
- K. “HFTD” means High Fire-Threat District.
- L. “PSPS” means Public Safety Power Shutoff, or an intentional de-energization event in weather conditions that create high risk of wildfires.
- M. “VM” means vegetation management.

### **DATA REQUESTS**

The following questions relate to BVES’s 2021 Wildfire Mitigation Plan (WMP) Update (2021 WMP).

#### **Question 1**

Page (P.) 111 of BVES’s 2021 WMP states, in regard to BVES’s Tree Attachment Removal program, “BVES estimates that the remaining 714 tree attachments will be removed by the end of 2026.”

P. 127 of BVES’s 2020 WMP refile states, in regard to the same program, “BVES estimates that all attachments will be removed by the end of 2022.”

- a) Please explain why BVES pushed back its estimated completion of the Tree Attachment Removal program by 4 years since submitting its 2020 WMP refile.

#### **Question 2**

P. 113 states, in regard to BVES’s Pole Loading Assessment and Remediation program, “As noted above, this is an ongoing project that is expected to be completed by 2026.”

P. 129 of BVES’s 2020 WMP refile states, in regard to the same program, “As noted above, this is an ongoing project that is expected to be completed by 2022.”

- a) Please explain why BVES has pushed back its estimated completion of the Pole Loading Assessment and Remediation program by 4 years since submitting its 2020 WMP refile.

#### **Question 3**

P. 115 states, “BVES plans to replace distribution bare wire in high risk areas within the HFTD with covered wire over a 10-year period of execution from 2021 to 2030 covering approximately 8.6 miles per year. Based upon this schedule, it will result in 50% of the 4Kv wire being replaced by 2026.”

On p. 69, Supporting Table 5.3-2 indicates that, in 2026, the Covered Wire Program (4 kV distribution) will be only 30% complete.

- a) Please explain the apparent discrepancy between the statements on pages 115 and 69 of BVES's 2021 WMP regarding the schedule for covered conductor installation.
- b) What is BVES's current planned schedule for covered conductor installation on 4 kV distribution?

#### **Question 4**

P. 120 of BVES's 2021 WMP states, "BVES conducts one LIDAR sweep per year to evaluate the effectiveness of clearance efforts and identify potential wildfire hazards."

P. 147 of BVES's 2020 WMP refile states, "Consequently, BVES proposes the pilot continue to perform two LIDAR inspections performed per year. If substandard conditions are not found after running the pilot for 2 years, then the pilot would be concluded and discontinued."

- a) Please explain why BVES reduced the number of LIDAR sweeps from two inspections per year to one inspection per year since submitting its 2020 WMP refile.
- b) In LIDAR inspections conducted in 2020, did BVES find "substandard conditions"? What percentage of miles covered had "substandard conditions" on each sweep?

#### **Question 5**

P. 122 of BVES's 2021 WMP describes the program "Sub-transmission and Distribution System Facilities Fly-over Unmanned Aerial Vehicle (UAV) Inspection."

- a) What is BVES's planned cycle (i.e., frequency) for these inspections? In other words, will BVES perform these inspections annually, or on some other cycle?
- b) Does BVES plan to perform detailed inspections of assets as part of this program? In other words, will the UAV slow down at each pole to take detailed photos of distribution assets, or will the UAV fly along the right-of-way at a more or less constant speed?
- c) Will the photos and video recordings from the UAV flights be reviewed by BVES staff, by the UAV vendor, or by third-party contractors?

#### **Question 6**

In response to Data Request CalAdvocates-BVES-2021 WMP-01A, BVES provided its FSC Matrix in the Excel file included with its response. According to this matrix, the circuit "Skyline (Summit Res)" has zero overhead miles, zero underground miles, and zero poles. Please provide more information on this circuit to explain these numbers.

#### **Question 7**

In response to Data Request CalAdvocates-BVES-2021 WMP-01A, Question 6, BVES stated, "All of BVES's vegetation management work is enhanced vegetation management (EVM) due to

BVES's entire service area being in the HFTD Tier 2 and 3. BVES's EVM program trims its circuits approximately every 2 years."

P. 126 of BVES's 2021 WMP makes reference to "the 3-year vegetation management program cycle."

- a) Please explain the apparent discrepancy between the above two statements in regards to BVES's vegetation management cycle.
- b) What is BVES's current vegetation management cycle?

### **Question 8**

In 2019 and 2020, how many times did BVES find that vegetation had encroached within four feet of the conductor? For each instance, please include the following:

- a) When the encroachment was discovered.
- b) When it was remediated.
- c) The species of vegetation involved.
- d) How the encroachment was discovered (e.g. ground patrol, LIDAR, etc.).

### **Question 9**

In response to Data Request CalAdvocates-BVES-2021WMP-01A, Question 10, Table 2, BVES stated, in regards to the Radford Line Covered Conductor Replacement Project, "US Forest Service permitting process has proven to be longer and more cumbersome than in previous projects."

- a) Has BVES secured USFS permits for the Radford Line Covered Conductor Replacement Project?
- b) If the answer to part (a) is yes, provide the date the permits were secured.
- c) If the answer to part (a) is no, when does BVES anticipate securing these permits?

### **Question 10**

In BVES's response to Data Request CalAdvocates-BVES-2020WMP-03 on October 13, 2020, BVES stated, "In January 2020, BVES hired a GIS Specialist. The Specialist made significant improvements in the BVES GIS. Unfortunately, the Specialist left BVES in September 2020. BVES is actively engaged in hiring another GIS Specialist."

P. 97 of BVES's 2021 WMP states, "BVES expects to fill a vacant GIS administrator role by mid-March 2021. This role has been vacant since Q3 2020."

- a) Has BVES hired another GIS Specialist?
- b) If the answer to part (a) is no, what is BVES's status on hiring a new GIS Specialist?

- c) Is the GIS administrator role mentioned on p. 97 the same as the GIS Specialist role mentioned in the above data request?
- d) If the answer to part (c) is no, please answer parts (a) and (b) for the GIS administrator role.

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**END OF REQUEST**