



September 16, 2021

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President  
California Public Utilities Commission  
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Re: Updates of Bear Valley Electric Service, Inc. (U 913-E) to the August 2021 Public Safety Power Shutoff Public Briefing in Response to President Batjer's August 31, 2021 Letter

In accordance with California Public Utilities Commission ("CPUC" or "Commission") President Marybel Batjer's August 31, 2021 Letter Re: August 2021 Public Safety Power Shutoff Public Briefings ("Letter"), Bear Valley Electric Service, Inc. ("BVES") submits this letter to provide additional details and updates in response to questions and directives in the Letter.

**1. PSPS Decision Making: An update on your company's plan to borrow and learn from PG&E, SCE, and SDG&E, and implement a more robust and sophisticated decision-making model.**

Response: BVES has reached out to Pacific Gas and Electric Company ("PG&E"), Southern California Edison Company ("SCE"), and San Diego Gas & Electric Company ("SGD&E") regarding borrowing and learning from their more robust and sophisticated Public Safety Power Shutoff ("PSPS") decision-making models. This information will then be used to implement a more robust and sophisticated decision-making model to guide BVES' PSPS process. The current status of this effort is as follows:

- **SDG&E-BVES Collaboration:** An initial meeting has been scheduled with Brian D'Agostino (Director of Fire Science and Climate Adaptation) and Augie Ghio, Director of Emergency Management, for September 16, 2021.
- **SCE-BVES Collaboration:** BVES reached out to SCE and a meeting has been coordinated for September 20, 2021 with Tom Brady and Tom Bortello of SCE. In the interim, SCE provided BVES a technical work paper to review.

- **PG&E-BVES Collaboration:** BVES reached out to PG&E on September 9, 2021 and PG&E is coordinating a meeting with BVES to review their decision-making model.

This planned coordination will help BVES best understand the PSPS Decision Making models utilized by PG&E, SCE and SDG&E and allow BVES to learn, borrow, and incorporate decision-making modeling and processes, as applicable to the BVES service territory, to improve BVES' PSPS Decision Making.

2. **Medical Baseline Customers and Equipment: An update on your company's plan to expand medical baseline program and support these customers during PSPS events by offering transportation and lodging services. In addition, please describe any plans you may have to deploy batteries to these customers and educate them on operating the batteries.**

Response: BVES continues its effort to expand medical baseline and Access and Functional Needs ("AFN") programs through personal customer contacts, advertising with local media channels, social media, the company website, and printed/mailed material. We have reached out to the local public transportation agency seeking a partnership and transportation arrangement for medical baseline and AFN customers during PSPS events, as well as other power-loss related emergencies, however they stated they will not transport customers with medical emergencies. BVES has entered into an agreement with the local Holiday Inn to pay for lodging should certain eligible customers be in need of such assistance. Regarding batteries, BVES has program material from SCE's Critical Care Backup Battery ("CCBB") program and is in the process of incorporating this information into our operating practices. We have staff available to deploy batteries to customers in the field on a small scale and educate each customer on the basic functionality of each battery unit.

3. **PSPS Exercises: An update on your company's plan to conduct functional exercises, not tabletop exercises. This is especially important due to your company's lack of experience in PSPS execution. Has your company conducted functional exercises specifically on operating Community Resource Centers (CRCs)? What actions are you taking to ensure CRCs will be operational, ideally located, and properly staffed if they are needed?**

Response: BVES conducted a PSPS exercise on June 21, 2021 in which the CRC was partially exercised. This event focused on ensuring the CRC setup instructions were correct and effective at getting the CRC functioning properly. The event also ensured CRC materials and equipment were in stock and at the ready for use.

**4. Wildfire mitigation: Please provide an update on your planned vegetation management activities for this year. When will the work be completed?**

Response: BVES' vegetation management clearance activities occur year round with the exception of 2 weeks during the December holiday period. Normally, BVES has three fulltime contracted crews working each business day during normal working hours. Due to the increased fire threat this year, BVES has added two additional vegetation clearance crews to accelerate the rate of clearance efforts and to respond to discrepancies noted in the vegetation inspection program.

BVES has increased its vegetation inspection efforts by:

- Assigning two additional experienced Linemen to work with the Field Inspector (an experienced Lineman) to perform a complete patrol of all overhead facilities. This is scheduled to be completed by September 18, 2021.
- Completed an inspection of all substations in BVES' service territory. All of the vegetation issues identified have been corrected.
- Accelerating review of the LiDAR survey conducted this summer and resolving any clearance issues. BVES expects to resolve all vegetation clearance issues identified in the LiDAR survey by the end of September 2021.
- Accelerating the unmanned aerial vehicle ("UAV") survey schedule and processing results to resolve any vegetation issues. The UAV survey is completed. BVES expects to resolve all vegetation clearance issues identified in the UAV survey by the end of September 2021.
- Accelerating the schedule for contracted 3<sup>rd</sup> Party Ground Patrol of circuits. This is in addition to the patrol conducted by the BVES Field Inspector augmented with additional Linemen.
- Internal Vegetation Management Quality Control checks have been increased to weekly for Officers, Managers, Supervisors, and other Subject Matter Experts.

As discussed above, BVES added additional vegetation clearance crews so that it can accelerate its planned clearance efforts while at the same time responding to problem areas noted in the various inspections described above.

**5. Access and Functional Needs (AFN) customers: How are you working to identify the number of AFN customers in your service territory beyond self-identification, especially in high fire risk areas?**

Response: BVES has entered into new confidentiality agreements with both the City of Big Bear Lake and the Big Bear Fire Department to begin the process of data sharing amongst agencies. All of BVES' service territory is in the high fire-threat district. BVES has also developed new contacts and working relationships with the local Red Cross representatives in our district, as well as other community organizations such as the Mountain Mutual Aid Association and Fire Safe Big Bear. Other efforts to reach visually and hearing impaired citizens is underway by reaching out to the California Council of the Blind, the Center For Access Technology, Disability Disaster Access Program & Resources, and NorCal Services for the Deaf and Hard of Hearing to better identify customers of need.

**6. PSPS Thresholds: What is the range of wind thresholds at which you would consider calling a PSPS event? How is covered conductor increasing those thresholds? Please provide specific numbers.**

Response: Currently, when extremely dry high fire threat weather exists, BVES will deploy wildfire response teams ("WRTs") to the field at wind speeds of 40-45 mph (actual or forecasted sustained or 3-second gusts). The WRTs will monitor the circuits, actual wind conditions in the field, and blow-in activity. If blow-ins are determined to be a safety issue, a de-energization event may be initiated at the direction of the Emergency Operations Center Director. At 55 mph wind speed (actual sustained or 3-second gusts) BVES will initiate de-energization of the affected portions of the circuit(s). BVES' entire service territory is above 3,000 feet. Therefore, BVES has constructed its facilities to High Loading District requirements. These higher loading standards allow BVES to use 55 mph as its wind speed of concern for de-energization.

When installing covered conductors, each pole or structure is fully analyzed for loading using a 3D stress model (SIPACalc), which is used to ensure a minimum safety factor of 2.67 (based on GO 95 Grade A safety factor). For structures that do not meet the 2.67 safety factor, they are replaced by a new structure with a safety factor of 4.0. Therefore, BVES has significantly higher confidence that the structures will withstand higher wind speeds.

When covered conductor sections are finished and bare overhead wire has been replaced with covered conductor, BVES has increased the threshold to 75 mph in the short-term during extremely high fire threat weather. BVES along with other IOUs has an initiative to further assess the threshold at which de-energization should be invoked. Pole assessments and covered conductor significantly reduce the risk of blow-ins; therefore, the blow-in threshold will likely be eliminated for those sections replaced with covered conductor. BVES expects that the current 75 mph threshold will increase further, once thorough engineering and risk analysis is completed.

BVES appreciates this opportunity to provide additional information and updates about its PSPS processes and plans. If you have any additional questions, please do not hesitate to contact me.

Respectfully Submitted,

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/s/

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