BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018).	Rulemaking 18-10-007 (Filed October 25, 2018)

REPLY COMMENTS OF BEAR VALLEY ELECTRIC SERVICE (U 913 E), A DIVISION OF GOLDEN STATE WATER COMPANY, ON THE WILDFIRE MITIGATION PLANS

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In accordance with the December 7, 2018 Assigned Commissioner's Scoping Memo and Ruling ("Scoping Memo"), the February 28, 2019 Corrected Email Ruling on Attachments to Comments and Reply Comments, and the March 5, 2019 Administrative Law Judge's Email Ruling Regarding Briefing, Bear Valley Electric Service ("BVES" or "Bear Valley"), a division of Golden State Water Company, provides these reply comments in response to intervenor comments on its wildfire mitigation plan ("WMP") and addressing various issues outlined in the Scoping Memo and discussed at the February 26, 2019 prehearing conference.

Introduction

Pursuant to Senate Bill ("SB") 901 and the Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018) ("OIR"), Rulemaking ("R.") 18-10-007 of the California Public Utilities Commission ("Commission"), BVES submitted its WMP on February 6, 2019. BVES' WMP addresses constructing, maintaining, and operating its electrical lines and equipment to minimize the risk of catastrophic wildfire. BVES applied a thoughtful approach in developing a holistic strategy to mitigate utility-posed wildfire risks pursuant to SB 901, including a strategic, risk-based evaluation that

resulted in efforts to improve operational practices, enhance existing mitigation measures, and monitor efforts over time.

In opening comments, certain parties provided feedback on BVES' WMP, offering recommendations and comments as to how the WMP might be modified. BVES believes that some suggestions are appropriate. However, given the current expedited schedule to implement WMP mitigation measures before the 2019 fire season, BVES believes that certain recommendations and feedback should be evaluated and addressed in future versions of its WMP.[1] BVES addresses specific recommendations below, raised in comments submitted by the Office of the Safety Advocate ("OSA"), the Public Advocates Office ("Cal Advocates"), Small Business Utility Advocates ("SBUA"), the California Environmental Justice Alliance ("CEJA"), the California Farm Bureau Federation ("Farm Bureau"), and the Mussey Grade Road Alliance ("MGRA").

I. Meaning of Plan Approval

While SB 901 requires the Commission's "review and approval" of WMPs,[2] parties disagree as to what approval of a utility's WMP actually means. As described by MGRA, the process outlined by SB 901 creates a fundamental timing problem:

> If the Commission decides ***not*** to hold that approval of the plans constitutes a reasonableness review, and to defer that decision to a future application by the utilities, then the utilities are operating at-risk with regard to spending on new programs specified in the WMPs, and have no guarantee of recovery. The constraints placed on the Commission with regard to the timeline for WMP scope

[1] The OIR states:

> The Commission does not expect to achieve perfection in the short time that will be available for the initial review and implementation of the first wildfire mitigation plans, but will work with the parties to make the best use of that time to develop useful wildfire mitigation plans. The Commission will also use this proceeding to further refine its approach to the review and implementation of subsequent electric utility wildfire mitigation plans. (OIR, p. 3.)

[2] Pub. Util. Code § 8386(b).

> and development have created a situation where due process rights for one or more parties may well be violated. … There may be safety impacts as well. If utilities are unsure as to certainty of recovery, they may hesitate to undertake expensive but possibly necessary improvements.[3]

While parties disagree as to the meaning of WMP approval, BVES believes that there is a way to harmonize the process so that utilities can move forward with wildfire mitigation measures while ensuring that the costs associated with such measures can still be thoroughly reviewed and ultimately approved in a utility's general rate case ("GRC").

To ensure that utilities have the funding assurance necessary to implement WMPs and further mitigate against wildfires as intended by SB 901, approval of a utility's WMP must mean that the proposed programs and mitigation measures outlined in the WMP are approved and deemed reasonable. Subsequently, in the utility's GRC, intervenors and interested parties will then have the opportunity to review and contest the reasonableness of any costs associated with implementing WMP programs and mitigation measures. That is, how a utility spends money and resources executing approved WMP programs and mitigation measures would be subject to review. However, the actual WMP programs and mitigation measures themselves, having already been approved by the Commission, would already be considered reasonable and would not be subject to second-guessing or additional review. In other words, why a utility chose to execute an approved WMP project would no longer be subject to review. For example, if a WMP proposes to replace existing bare overhead conductor with covered conductor, once the WMP is approved, the utility's determination to replace the conductor with covered conductor would be deemed reasonable. However, parties would have the opportunity to contest the costs of the conductor replacement as part of the utility's GRC.

[3] MGRA Comments, p. 4, footnote omitted, emphasis in original.

This approach is consistent with SB 901. Under SB 901, before the Commission approves a utility's WMP, parties and the public are afforded the opportunity to examine and contest the proposed WMPs and the proposed measures and programs included in the WMPs.[4] This is the opportunity for parties to contest any proposed WMP program or mitigation measure. SB 901 requires that the Commission consider comments from "the public, other local and state agencies, and interested parties, and verify that the plan complies with all applicable rules, regulations, and standards, as appropriate."[5] In addition to considering outside feedback on WMPs, the Commission will also carefully review WMPs and any proposals in the WMPs. Based on this information and the record developed in the instant proceeding, the Commission can then approve, disapprove, or require modifications to the WMPs.[6]

Once WMPs are approved, utilities will begin implementing the programs and mitigation measures outlined in their WMPs. Indeed, SB 901 requires that once approved, utilities must demonstrate compliance with their WMPs, which is reviewed by the Commission.[7] However, the utilities can only implement their WMPs if there is funding for the WMP programs and mitigation measures. SB 901 recognized the necessity for WMP funding and accordingly requires that the Commission "shall authorize the utility to establish a memorandum account to track costs incurred to implement the plan."[8] However, providing the assurance needed to

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[4] Furthermore, parties have the opportunity to review proposed costs for WMP programs and mitigation measures. As noted by Farm Bureau, "in establishing the templates for the WMPs cost estimates were required to weigh the cost implications." (Farm Bureau Comments, p. 3.)

[5] Pub. Util. Code § 8386(d).

[6] "Prior to approval, the commission may require modifications of the plans." (Pub. Util. Code § 8386(b).)

[7] Once approved, "the commission shall oversee compliance with the plans." (Pub. Util. Code § 8386(b).)

[8] Pub. Util. Code § 8386(e).

actually implement WMPs, requires that approval of the WMP constitutes approval of the programs and mitigation measures outlined in the WMP.

BVES recognizes that SB 901 requires that consideration as to whether costs of implementing WMPs are just and reasonable will be reviewed in general rate case applications, and believes its proposal is consistent with the statute.[9] While approval of the WMP would constitute approval of WMP programs and mitigation measures, the costs of implementing those programs and mitigation measures would then be subject to reasonableness review as part of the utility's GRC. This would be the opportunity for parties to ensure "that the approach for the programs is the most cost-effective method available to the utility."[10]

However, the GRC is not the forum to review the actual programs or mitigation measures in WMPs, which would have already been approved by the Commission. Therefore, while review of WMP costs in the GRC may be appropriate, since the utilities are acting upon approved WMP programs and measures, the GRC is not an opportunity to challenge those WMP programs and measures. Approval of the WMP can only be considered a finding that the proposed WMP programs and measures are reasonable.

Furthermore, BVES' proposed meaning for WMP approval is consistent with Commission precedent. In Decision 10-06-048, the Commission approved a flexible spending approach for a utility reliability program, concluding that "expenditures authorized by this decision will be subject to the same reasonableness standards as for projects that are forecasted and adopted in the GRC process. That is, once completed, there is no requirement for a

[9] Pub. Util. Code § 8386(g).

[10] Farm Bureau Comments, p. 5, footnote omitted.

reasonableness showing or review."[11] The Commission should similarly conclude that approval of a utility's WMP constitutes approval of the WMP programs and mitigation measures, ensuring that there is no requirement for any additional reasonableness review of the approved WMP programs and mitigation measures.

BVES' proposal is also consistent with recommendations made in opening comments. For example, the approach recommended by Cal Advocates describes how "each utility is authorized to establish a memorandum account to track costs beginning with the date the Plans are approved, which allows for the consideration of whether the costs incurred to implement the plan was just and reasonable in their GRCs."[12] Further, as described by Farm Bureau, this process will ensure "that specified programs would commence as soon as possible yet ensure the Commission would exercise its full oversight over the costs."[13] Accordingly, approval of WMPs should ensure that WMP programs and mitigation measures are approved and deemed reasonable.

A. Approval of WMPs Must Allow for Modifications and Improvements

As described above, once approved, utilities must demonstrate compliance with their WMPs, which is reviewed by the Commission.[14] As described by CEJA:

> SB 901 requires an analysis of factors including whether the "noncompliance resulted in harm," whether the utility self-reported the "circumstances," whether the utility implemented corrective actions, and whether the utility "had previously engaged in conduct of a similar nature that caused significant property damage or injury." As shown by this language, SB 901 hinges on evaluation of the harm that occurs from a utility's actions, circumstances that may cause harm, self-corrections,

[11] D.10-06-048, p. 43.

[12] Cal Advocates Comments, p. 2, footnote omitted.

[13] Farm Bureau Comments, p. 4.

[14] Once approved, "the commission shall oversee compliance with the plans." (Pub. Util. Code § 8386(b).)

> and exercise of reasonable care. These factors are not focused, for example, on the specific amount of hardening done, but rather on how well the system is working at preventing wildfires.[15]

As outlined by SB 901 and described by CEJA, WMPs should be implemented to most effectively prevent wildfires. To do so, it is important that utilities have the flexibility to improve upon proposals in WMPs to best mitigate against risks. Such an approach will ensure that WMPs are most "effective for mitigating wildfire risk,"[16] while similarly ensuring that utilities can incorporate lessons learned and best practices to avoid or limit proposals and associated costs that may prove less effective or which may be better addressed by other measures. This will allow utilities to incorporate lessons learned to most effectively address wildfire risk.

Such flexibility is also necessary given the timeframe and limits that are likely to impact WMP implementation. For example, availability of resources may require utilities to adjust proposals in their WMPs. If, for example, there is a shortage of covered conductor or a shortage of certified contractors that can implement WMP proposals, utilities should have the flexibility to deviate from their approved WMPs given the lack of available resources to timely implement approved WMP proposals. Similarly, if scarcity, increased demand, or other factors impact prices for products or services such that costs for approved WMP proposals become unreasonable or restrictive, utilities should have the ability to deviate from the approved WMP to ensure mitigation measures can occur without subjecting customers to unreasonable costs.

Flexibility is particularly important given the expedited schedule required by SB 901. As described by the Commission in the OIR:

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[15] CEJA Comments, p. 4, footnote omitted.

[16] CEJA Comments, p. 4.

> The Commission does not expect to achieve perfection in the short time that will be available for the initial review and implementation of the first wildfire mitigation plans, but will work with the parties to make the best use of that time to develop useful wildfire mitigation plans. The Commission will also use this proceeding to further refine its approach to the review and implementation of subsequent electric utility wildfire mitigation plans.[17]

Utilities should similarly be allowed to make the best use of the limited time they have to implement WMPs to refine proposals to enact effective and reasonable mitigation measures. To the extent that a utility does deviate from its approved WMP to address situational needs and/or improve mitigation measures, such deviations could then be fully reviewed and addressed in the utility's GRC.

II. Overall Objectives and Strategies

A. At Risk Assets Due to Extreme High Wind Corridors

In opening comments, OSA states:

> Considering the effects of climate change and the extreme weather conditions that are part of the new normal in California, OSA recommends that Bear Valley Utilities investigate the unique topography within their service territory. Specifically, within the Tier 2 & Tier 3 high fire risk areas that includes mountain ridges, canyons and other topographical features that create extreme wind corridors. Then utilize this information to develop targeted, enhanced inspections and determine if structural improvements are necessary for their most vulnerable distribution and transmission assets. These inspections and considerations should be given to both overhead distribution facilities and transmission facilities.[18]

BVES agrees with OSA's recommendation.

III. Risk Analysis and Risk Drivers

A. Evacuation Study

According to OSA:

> OSA is recommending that Bear Valley do a traffic simulation and evacuation study. Bear Valley needs to find an expert to work with who can do an evacuation

[17] OIR, p. 3.

[18] OSA Comments, p. 12.

> study and examine anticipated traffic conditions and evacuation times associated with various rates of evacuation responses and alternative management strategies that could be used in response to them and develop a workable plan. Bear Valley needs to work with their jurisdictional representatives from Cal FIRE, San Bernardino County's Sheriff's Department, and the California Office of Emergency Services (OES) to develop an evacuation plan. Additionally, the evacuation issues should always be a consideration when determining risk analysis and drivers when developing their WMP, and also, whether or not a PSPS is necessary to insure public safety due to evacuation issues.[19]

Bear Valley agrees with OSA that evacuation planning is extremely important in wildfire mitigation planning. However, Bear Valley considers that evacuation planning is a primary responsibility of local government and emergency responders. Bear Valley stands ready to support any local government or emergency responder planning initiatives including a traffic simulation and evacuation study. Bear Valley is actively working with local government to determine what support Bear Valley can reasonably provide in this effort from the electric utility perspective. However, Bear Valley does not agree with OSA that Bear Valley should take the lead in conducting a traffic simulation and evacuation study for the following reasons:

- Evacuation planning and execution is a local government function.
- Bear Valley has no authority to develop and/or implement an evacuation plan.
- Local government may have already conducted such analysis.

Bear Valley will work closely with its jurisdictional representatives from Cal FIRE, San Bernardino County's Sheriff's Department, and the California Office of Emergency Services ("OES") to provide evacuation plan support as deemed reasonable by local government.

B. Mitigation for Wildlife Caused Faults

OSA states:

> For these reasons OSA recommends that Bear Valley investigate other mitigation solutions to address animal and bird caused faults for both their electrical

[19] OSA Comments, p. 23.

> distribution facilities and their transmission facilities, such as, developing avian-safe design standards. Standards used by other California utilities include Avian-safe designs for transmission and distribution structures require framing poles with 60-inch horizontal and 40-inch vertical phase-to-phase and phase-to ground separations, extending center phase of a three-phase crossarm design, or by using covers to insulate potential phase-to-phase and phase-to-ground contact by avian species or other wildlife. Phase-to-phase and phase-to-ground separation distances are based on the dimensions of eagle's wing spans for utilities located in areas where eagle interactions and bird incidents may occur at distribution, transmission, and substation facilities. Additionally, there are different wildlife protection devices available on the market that can be investigated. Bear Valley should develop a wildlife facilities protection plan for their distribution facilities and transmission facilities located in Tiers 2 & 3 of the HFTD map.[20]

BVES agrees with OSA's recommendation that a wildlife protection program is an important issue. However, for this initial WMP, BVES chose to focus on the top three most likely and severe risk drivers, which were determined to be vegetation contact with bare conductor, wire down, and conventional fuse blowing events based on data from BVES operations in the previous 10 years, which is reflective of the unique geography, environment, climate, and wildlife encountered in the BVES service area. The following table shows the top three risk driver events as well as animal and bird caused fault events for the period of 2009 to 2018.

Event Type	**Count (2009 – 2018)**
Vegetation-Bare Line Contact	88
Wire Down	15
Blown Conventional Fuse	203
Animal & Bird Caused Faults	6

That said, BVES is not ignoring the wildlife caused faults issue; it is just not prioritizing it in this initial WMP. BVES does have a wildlife protection program in place and is, in fact, pursuing various small projects using ongoing capital improvement projects. For example,

[20] OSA Comments, pp. 23-24.

BVES will be installing wildlife protection at its largest substation, Meadow Substation, in 2019. Future WMPs will address wildlife protection, as mitigation measures are implemented to address the higher risk drivers.

C. Notification Timeline for Public Safety Power Shut-Off (PSPS) Events

According to OSA:

> Bear Valley has described on page 36 of their WMP a four-step action plan for executing a PSPS shown in Table 4-6. This plan describes what steps Bear Valley will be taking when weather conditions develop that could lead to having to start de-energization procedures. For each step of the plan who will be notified at that stage of the plan is stated. Bear Valley states that they will contact local governments and agencies that could be affected by the PSPS at stage one of the execution steps and also throughout the process, but the plan does not say anything about contacting critical service providers, such as, water treatment plant owners, telecommunications providers, hospitals, nursing homes, or school districts. The action plan also does not distinguish between residential customer types either. For instance, there is no description of baseline medical customers or vulnerable customers described or is there any information on how these types of customers will be tracked or contacted during the execution of their PSPS procedures.
>
> Another missing component of Bear Valley's PSPS plan is that there is no established time line for when these four stages will take place. Will stage one be 5 to 6 days before leading into the PSPS activation or 4 to 5 days before? When will customers be notified especially their critical service providers? This is critical information for these different types of customers to have so that they will have enough time to prepare for the PSPS event.[21]

BVES agrees with OSA that its WMP should provide more specificity as to which specific customers (critical infrastructure and service provides, schools, hospitals, medical baseline customers, etc.) will be notified and will update internal procedures to ensure these customers are notified with as much advanced notice as possible. BVES has not identified a timeline since the process is forecast driven. Step 1 (Forecasted Extreme Fire Weather Conditions) is based on when the actual forecasts are issued and will be implemented when

[21] OSA Comments, pp. 24-25.

announced. Based on past experience, generally, this would occur 4 to 5 days prior to the weather event. The remaining steps are triggered based on actual conditions in the field and cannot be reasonably time-lined out.

IV. Wildfire Prevention Strategy and Programs

A. System Hardening

1. Undergrounding

Cal Advocates states:

> Bear Valley claims that due to complications with the June 2016 Holcomb Fire, it must underground the Ute Lines. Bear Valley also claims that the undergrounding project would involve a transfer of the Ute Lines from SCE to Bear Valley. However, Bear Valley does not provide sufficient information to justify this undergrounding request as a wildfire risk reduction measure, versus a system reliability enhancement measure. Bear Valley does not explain why it did not identify this project in its General Rate Case application, A.17-05-004. Bear Valley should be required to provide additional information in this portion of its plan in its 2020 WMP filing.[22]

First, BVES notes an error in its WMP in that the Holcomb Fire occurred in June 2017, not 2016, as indicated in its WMP.[23]

At the time BVES filed its most recent GRC, Application ("A.") 17-05-004, on May 1, 2017, this proposed project had not been developed (Holcomb Fire occurred after the filing of the most recent BVES GRC).

BVES further notes that the development of mitigation measures to reduce wildfire risk drivers is an ongoing and developing process. Therefore, excluding projects and programs that would mitigate wildfires just because they were not included in a past GRC, as Cal Advocates appears to suggest, is not a sound technical basis for evaluating wildfire mitigation measures.

[22] Cal Advocates Comments, p. 14, footnotes omitted.

[23] BVES WMP, p. 21.

The Commission should not use this as the basis for approving WMP projects, programs, and other mitigation measures.

The SCE Ute Lines (1 & 2), which only serve BVES, consist of approximately 1.5 miles of overhead sub-transmission bare lines (34.5 kV) that connect the BVES system at two points with the SCE Goldhill Switch Station. The Ute Lines (1 & 2) run on the same poles for a large section of the circuit. These SCE assets are located in the U.S. Forest Service area and in an environmentally sensitive area known as the "pebble plane". These lines provide approximately 72% of rated supply capacity and, under normal conditions, 100% of BVES' supply loads. These lines allow BVES to adopt a defensive operational scheme during the fire season by allowing the de-energization of the Radford Line (from the Redlands), which mostly traverses a High Fire Threat District ("HFTD") Tier 3 area. The Ute Lines (1 & 2) are completely in a HFTD Tier 2 area. Therefore, these lines are critical to BVES' energy supply and reliability, and permit BVES to significantly mitigate risk of wildfire in its HFTD Tier 3 area.

The Holcomb Fire of June 2017 damaged several SCE facilities including the Ute Lines (1 & 2) causing a complete loss of electric supply from Lucerne. Following the Holcomb Fire, BVES entered discussions with SCE on how to improve safety and reliability of the supply from Lucerne. While the lines did not cause the Holcomb Fire, it is clear the area is susceptible to wildfire (very dry vegetation and consistently high winds – HFTD Tier 2). Therefore, BVES and SCE explored the prospect of:

- BVES constructing lines equivalent to the Ute Lines (1 & 2) along Holcomb Valley Rd, Big Bear from the SCE Goldhill Switching Station (located adjacent the Big Bear Transfer Station (disposal) and Landfill) to the BVES 34 kV sub-transmission system on Highway 18 (North Shore Dr.).

- SCE would then remove its Ute Lines (1 & 2) assets from the U.S. Forest Service area.

This project was determined to be optimal because it:

- Removes the threat of lines causing possible wildfire in the area.
- Significantly improves reliability of the main source of supply for the BVES service area by: (1) removing the single point of failure (both lines on same poles), and (2) undergrounding the lines to make them less susceptible to common overhead reliability vulnerabilities such as weather (ice, wind & snow), vegetation, animals, car-hit-poles, etc.
- Moves electrical assets out of the U.S. Forest Service and environmentally sensitive areas reducing the impact of inspections, maintenance and repair construction work on the sensitive environment of the area.

2. Fuse Replacement

Cal Advocates states:

> Bear Valley also plans to replace all fuses on its system over the next two years with approximately 457 electronic fuses and 2,327 with current-limiting fuses, for an estimated total of $5.2 million. Bear Valley does not include any data or testing information as to how effective the fuse changes are in reducing the risk of wildfires on its system. Bear Valley states this project follow the trend of utilities replacing conventional fuses with current limiting fuses. In addition, Bear Valley does not provide information about the benefits and uses of electronic programmable fused trip savers, which it proposes to install systemwide. Bear Valley does not state why this project is not listed in its GRC application. Additionally, Bear Valley should identify if the proposed new fuses pose new or different risks than the existing fuses. This information should be provided as an update to Bear Valley's 2019 WMP.[24]

[24] Cal Advocates Comments, pp. 14-15, footnotes omitted.

At the time of BVES filing its Test Year ("TY") 2018 GRC, A.17-05-004, on May 1, 2017, this proposed project had not been developed on the scale proposed in the WMP. At that time, BVES was planning to use its on-going capital improvement budget to replace conventional fuses with electronic and current limiting fuses ("ELF"). As mitigations to reduce the risk drivers to wildfires developed in the industry, BVES began to re-evaluate its fusing policy and developed for this WMP a strategy to replace conventional fuses at branch lines with electronic fuses and to replace conventional fuses at transformers with ELF. The electronic fuses can be programmed to limit the duration of a fault on the system (similar to a conventional fuse), thereby providing protection to the system. ELF fuses are current limiting (limit the magnitude of the fault current rather than the duration) and are best suited to be close to the equipment they are protecting, such as transformers.

Conventional fuses (also known as expulsion fuses) in fuse holders vent either out the bottom of single-venting fuse holders, or out both the top and bottom of double-venting fuse holders. When clearing occurs, exhaust gases, molten metal and fuse link fragments are expelled from the vent end of the fuse holder. This venting/clearing operation is also extremely loud. Therefore, BVES, as well as many other utilities, have determined that these types of fuses pose a risk of fire. The following table provides a comparison among conventional fuses, electronic fuses, and current limiting fuses (ELF):

Fuse Type:	**Conventional Fuse**	**Electronic Fuse**	**ELF**
Technical Description:	Expulsion fuses in fuse holders vent either out the bottom of single-venting fuse holders, or out both the top and bottom of double-venting fuse holders. When clearing occurs, exhaust gases, molten	TripSaver II is a single phase cutout mounted recloser used to eliminate unnecessary outages. It supports up to three reclosing operations before dropping from the cutout and each	ELF™ fuse is a full range, current-limiting dropout fuse with a self-contained design that eliminates noise and expulsive showers associated with expulsion fuse operation, making it

	metal and fuse link fragments are expelled from the vent end of the fuse holder. This venting/clearing operation is also extremely loud. An expulsion fuse is not current limiting and, as a result, limits the duration of a fault on the electrical system, not the magnitude.	operation can be programmed to trip using a variety of time-current characteristic (TCC) curves with a configurable open interval between tripping operations. During a transient fault, the TripSaver II will open momentarily based on the TCC curve then reclose restoring power. During a permanent fault, the TripSaver II will go through its tripping sequence based on the TCC curves and drop open from the cutout on the last operation. However, if the mode selector lever is down with the hidden red label visible, the TripSaver II will be in non-reclose mode or "one shot to lockout". The purpose of this test is to prove the TripSaver II is designed to limit any such arcs, sparks or hot materials sufficiently to prevent the ignition of flammable vegetation.	suitable for use in areas where a high fire hazard exists. The ELF-LR fuse has been granted permanent exemption by the California Department of Forestry and Fire Protection (CAL FIRE) from pole clearance requirements when the fuse is installed in the field according to manufacturer's specifications. The ELF fuse is designed to be used to protect pole-type transformers, singlephase and three-phase laterals and underground taps. The full-range current-limiting rating ensures reliable operation of all over-loads and fault currents.

A conventional fuse (expulsion fuse) is not current limiting. It limits the duration of a fault on the electrical system, not the magnitude. In order to benefit from the ability to limit fault duration, BVES would use electronic fuses. However, these are significantly more expensive. Current limiting fuses (ELF), on the other hand, are significantly less expensive than electronic fuses. Therefore, by using the strategy discussed above to replace conventional fuses at branch

lines with electronic fuses and to replace conventional fuses at transformers with ELF, BVES is able to achieve the same requisite level of fault protection at a lower cost than trying to replace all conventional fuses with electronic fuses.

BVES notes that the development of mitigation measures to reduce wildfire risk drivers is an ongoing and developing process. Therefore, excluding projects and programs that would mitigate wildfires just because they were not included in a past GRC as Cal Advocates appears to suggest, is not a sound technical basis for evaluating wildfire mitigation measures and the Commission should not use this as the basis for approving WMP projects, programs, and other mitigations.

B. Situational Awareness

Cal Advocates states:

> Bear Valley outlines several critical operations and resources that enhance situational awareness, but asserts in its WMP and responses to data requests that it has limited staff, especially for afterhours work. For example, Bear Valley proposes to install HD cameras for remote monitoring in areas that are difficult to patrol on foot, but states that it does not have staff to monitor the cameras. Bear Valley considered hiring contractors to monitor the cameras, but did not discuss the possibility of increasing its internal staff as an option. It is not clear given these staffing limitations how Bear Valley will benefit from the camera installations. Therefore, Bear Valley should update its 2019 Plan to address this specific issue. The Commission should require Bear Valley to conduct a cost-benefit analysis that compares hiring additional staff versus hiring contractors in its 2020 WMP, particularly if Bear Valley finds its enhanced situational awareness program valuable this year in reducing risk or enhancing safety.[25]

As stated in its WMP and responses to Data Requests, BVES does not propose to install HD cameras in its service area for the period of this WMP. BVES proposes to evaluate the installation of HD cameras but has several technical issues to resolve:

[25] Cal Advocates Comments, pp. 17-18, footnotes omitted.

- How will the data be transferred back to BVES from the HD cameras? BVES' service area is rural and mountainous; therefore, the ability to backhaul data is not simple.
- How will the data be used and evaluated? BVES has a small staff and hiring additional staff to monitor HD cameras 24/7 could be very expensive. BVES would like to explore partnering with other entities in the area that may also benefit from the cameras to solve this issue. Additionally, BVES would like to research automated systems that may detect sparking, flare ups, and fire.

BVES does not propose to hire contracted staff to monitor HD cameras in its WMP and is unsure where Cal Advocates drew this conclusion. BVES does, however, propose to contract out about 8 hours per week of weather forecasting services.

C. PSPS

Cal Advocates states:

> Bear Valley's PSPS procedures could be improved to ensure customers are given adequate notification of possible de-energization events under Imminent Extreme Fire Weather Conditions. When wind speeds are measured at or above 50 mph for more than three seconds, Bear Valley initiates its plan of action which can include de-energizing power lines that may pose a hazard. At this stage, Bear Valley's planned notifications include continuing coordination with local government and agencies, updating notifications on its website and social media to warn of potential power shutoffs, and issuing press releases to the local media. During Validated Extreme Fire Weather Conditions, notifications are sent to customers through an Interactive Voice Response (IVR) system.
>
> Bear Valley should consider amending its PSPS procedures or explain why it is not reasonable to include IVR notifications to all customers that may be affected by a de-energization event during Imminent Extreme Fire Weather conditions. Bear Valley's WMP does not mention if notifications will be available in Spanish and the top three primary languages in the state other than English or Spanish determined in accordance with PU Code Section §8386(c)(16)(B): "Plans for community outreach and public awareness before, during, and after a wildfire, including language notification in English, Spanish, and the top three primary languages used in the state other than English or Spanish, as determined by the

> Commission based on the U.S. Census data." The Commission should direct Bear Valley to rectify this in an update to its 2019 WMP.[26]

BVES agrees with Cal Advocates that its 2019 WMP should be updated to include IVR notifications. BVES will immediately include Spanish in its notifications and pursue compliance with Public Utilities Code Section §8386(c)(16)(B) for the top three primary languages used in the state other than English or Spanish.

D. Alternative Technologies

Cal Advocates states:

> Bear Valley states that the technologies it has chosen to mitigate fire risks are appropriate and, therefore, it has not discussed any alternative technologies in its WMP. Bear Valley plans to consider implementing alternative technologies as they become available and to explore its options in future iterations of the WMP. Bear Valley's future WMPs should be informed by consideration of alternative technologies.[27]

BVES agrees with Cal Advocates that future WMPs should be informed by consideration of alternative technologies.

E. Customer Support After a Wildfire

SBUA states:

> SBUA recommends that all of Mitigation Plans (with the exception of SCE's Plan, as noted below) be revised to specifically consider how best to assist small business customers. The utilities should be required to propose tangible provisions post-wildfire for customer support and outreach, financial assistance, and collaboration that are targeted to help small business customers, especially in small business health providers and hard-to-reach communities that rely on small commercial centers to remain operational in times of emergency.
> …
> The utilities should carry the burden of proactively identifying accounts eligible for relief and of outreaching to these customers because after a catastrophic wildfire customers may not prioritize contacting their utility service provider, rightfully so, or may not even be aware that they are eligible for financial support. SCE commendably proposes to have customer service representatives contact customers

[26] Cal Advocates Comments, pp. 20-21, footnotes omitted.

[27] Cal Advocates Comments, p. 22, footnote omitted.

> using the customer's previously designated preferred method of communication. And we recommend that all of the utilities be required to include like proposals for small business customers.
>
> Although the Mitigation Plans propose programs that will provide financial support to low-income residential customers, comparable plans to assist small business customers are missing from the plans of PacifiCorp and Bear Valley. Many small businesses are locally owned so the owners may have both their home and business damaged by a wildfire, exacerbating the financial impact a fire may have on them. Therefore, the Mitigation Plans should propose financial support programs tailored to small business customers. SBUA suggests using SCE's Plan as a model for the minimal requirements the utilities should have to comply with.
>
> Excepting SCE, another global concern with all of the Mitigation Plans and their outreach proposals is that customers may not have selected a preferred method of communication prior to the catastrophic wildfire. To improve these outreach programs, the utilities should follow SCE's procedure for notifying critical care customers of power outages. For these customers, SCE provides outage notifications using the customer's primary and alternative preferred methods of communication, and, in the event the customer cannot be reached, SCE attempts to reach the customer via other methods including sending a field representative to attempt to physically contact the customer. Likewise, to provide customers with information on disaster relief they are eligible for, all of the other utilities should include in their Mitigation Plans a proposal for exhausting every method of communication if they cannot reach a customer using the customer's preferred communication method.
>
> In the event that a utility does not have the capacity to serve all customers impacted by a fire at once, utilities should prioritize serving customers who meet the definition of hard-to-reach customers adopted by the Commission in D.18-05-041. Finally, SBUA recommends that the Mitigation Plans include surveys within the small business communities to better understand the needs of these customers.[28]

Although BVES appreciates SBUA's comments, SBUA's concern is unfounded. Though not explicitly described in its WMP, D.18-08-004 extended the emergency customer protections adopted in Resolutions M-4833 and M-4835 to customers of all investor-owned utilities,

[28] SBUA Comments, pp. 7-9, footnotes omitted.

including BVES. Accordingly, as outlined in Advice Letter 347-E, BVES is already providing the customer support requested by SBUA.[29]

V. Emergency Preparedness, Outreach and Response

BVES has no comments on this issue at this time, but looks forward to working with other parties going forward to further refine and improve emergency preparedness, outreach, and response issues in future WMPs.

VI. Performance Metrics and Monitoring

A. Reporting Requirements

SBUA states:

> SB 901 requires the utilities to make public an "accounting of the responsibilities of persons responsible for executing the plan." Although the Plans include information on the positions, Plans should include additional information including the names of the specific people holding those positions as well as providing their contact information. PG&E's Plan lists the positions but does not include the name or contact information for the people holding these titles; Bear Valley does not give the name of the director who administers the plan; PacifiCorp does not disclose the name or contact information of the directors; SDG&E's Plan needs to disclose the contact information of people holding the various titles. Although a strict reading of subdivision (c)(1) suggests that only the titles and descriptions of duties need to be disclosed in the Plans, the utilities should disclose the names and contact information of people holding these positions so that the Commission and the public may be aware of who to address correspondence to in the event of a future issue.[30]

As SBUA concludes, only the titles and descriptions of duties need to be disclosed in the WMPs. BVES has chosen to not include names as staff changes during the normal course of business but generally, the responsibilities of various positions do not change as often. This is

[29] AL 347-E is available at https://www.bves.com/media/managed/approvedadviceletters3/347_E_Emergency_Customer_Protections_Memorandum_Account_Approval.pdf.

[30] SBUA Comments, pp. 11-12, footnotes omitted.

standard practice in policy and procedural documents such as the WMP. BVES is willing to provide SBUA the names of current incumbents privately.

VII. Recommendations for Future WMPs

As described in the OIR:

> The Commission does not expect to achieve perfection in the short time that will be available for the initial review and implementation of the first wildfire mitigation plans, but will work with the parties to make the best use of that time to develop useful wildfire mitigation plans. The Commission will also use this proceeding to further refine its approach to the review and implementation of subsequent electric utility wildfire mitigation plans.[31]

BVES agrees that future WMPs will be further refined and improved, as noted by the Commission. To help ensure that future WMPs can best be improved to further mitigate against wildfire risks, BVES recommends that sufficient timing be provided to ensure that WMP feedback and recommendations can be fully vetted and incorporated into utility WMPs. Specifically, utilities should have sufficient time to implement improved wildfire mitigation measures and programs prior to the start of wildfire seasons.

VIII. Other Issues

A. Memorandum Accounts

Cal Advocates states:

> Both Liberty CalPeco (Liberty) and Bear Valley request authority to establish second memorandum accounts to record the expenses related to WMP programs and projects not currently within the scope of their respective GRCs. The Commission should direct both Liberty and Bear Valley to utilize the SB 901 memorandum account and Fire Hazard Prevention memorandum account as appropriate. Subaccounts within these accounts could be established to allow for more granular tracking if necessary.
>
> Additionally, for projects that the Commission has previously not authorized cost-recovery but where the utility now seeks cost recovery again, the Commission should direct the utility to provide supplemental information about the specific

[31] OIR, p. 3.

changed facts and conditions around seeking authorization this time through the WMPs.[32]

BVES is not opposed to Cal Advocates' recommendation to use subaccounts in its SB 901 memorandum account and Fire Hazard Prevention memorandum account as appropriate.

IX. Conclusion

BVES appreciates this opportunity to address party concerns by providing additional information and details about its WMP and looks forward to working with the Commission and parties to further refine and improve future WMPs.

Respectfully submitted,

/s/

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[32] Cal Advocates Comments, p. 25, footnotes omitted.