



Via Electronic Mail

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Caroline Thomas Jacobs, Director
Wildfire Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Caroline.ThomasJacobs@cpuc.ca.gov

Subject: Comments on Wildfire Safety Division Draft Action Statement Regarding Bear Valley Electric Service, Inc. 2020 Wildfire Mitigation Plan Refile and Draft Resolution WSD-013.

I. INTRODUCTION

On December 11, 2020, the Wildfire Safety Division (“WSD”) issued a draft Action Statement and associated draft Resolution WSD-013 with respect to Bear Valley Electric Service Inc.’s (“BVES” or “Bear Valley”) 2020 Wildfire Mitigation Plan Refile. Pursuant to Rule 14.5 of the Commission’s Rules of Practice and Procedure, and Director Caroline Thomas Jacobs’ December 11, 2020 cover letter, stakeholders may submit comments on the draft Resolution WSD-013 within 20 days of issuance of the draft WSD-013 Resolution. These comments are timely filed.

II. BACKGROUND

After BVES filed its initial 2020 Wildfire Mitigation Plan (“2020 WMP”) on February 7, 2020, as well as an amended and errata 2020 WMP which included substantive changes, WSD issued a Final Action Statement denying Bear Valley’s 2020 WMP filings. WSD ordered BVES to submit a new 2020 WMP (“2020 WMP Refile”) filing no later than 60 days from August 26, 2020. BVES timely refiled its 2020 WMP Refile on September 18, 2020, as well as a Remedial Compliance Plan addressing deficiencies set forth in Resolution WSD-002.¹

¹ Draft Resolution WSD-013 at p. 1.

WSD evaluated Bear Valley's 2020 WMP Refile and issued a draft Action Statement, along with an associated draft Resolution WSD-013, conditionally approving Bear Valley's 2020 WMP Refile.² Bear Valley's comments on the draft Resolution WSD-013 are set forth below.

III. DISCUSSION

A. BVES Accepts and Supports Conditional Approval of Its WMP Refile.

BVES appreciates WSD's thoughtful and thorough analysis of Bear Valley's 2020 WSD Refile, as well as WSD's conditional approval.³ BVES accepts and supports WSD's conditional approval of Bear Valley's WSD Refile. BVES recognizes that nothing in Resolution WSD-013 should be construed as approval of any WMP-related costs.⁴

B. BVES Requests That Costs of Requiring Extensive Data Collection and Sophisticated Analytics on BVES' Small Service Territory and Customer Base Be Taken Into Account.

Draft Resolution WSD-013 notes that in providing risk spend efficiency ("RSE") data, BVES appears to heavily rely upon its subject matter experts' input to evaluate risk. It recognizes that BVES plans to develop a model to quantify risk drivers and associated probabilities within the next three years.⁵ WSD observes that BVES, like its peer small and multijurisdictional utilities, has not been subject to Safety Model Assessment Proceeding ("S-MAP") or Risk Assessment Management Phase ("RAMP") requirements, and is in its early stages of incorporating risk-based information decision-making with respect to selection of wildfire mitigation measures.⁶

To be clear, Bear Valley is committed to reducing its reliance on subject matter experts' input to evaluate risk and undertaking efforts to develop models, analytics and data to better quantify risk drivers and associated probabilities. However, in assessing Bear Valley's efforts in this regard, it is requested that WSD take into account Bear Valley's very small customer base and small service territory. WSD noted in its draft Action Statement that BVES is one of the smallest electrical corporations, with a service territory of only 32 square miles (*i.e.*, very limited number of line miles) and finite financial resources.⁷

² WSD Draft Action Statement of BVES WMP Refile at pp. 2-3.

³ *Id.* at p. 5.

⁴ Draft Resolution WSD-013 at p. 59.

⁵ *Id.* at p. 18.

⁶ WSD Draft Action Statement at p. 6.

⁷ *Id.* at p. 5.

BVES appreciates WSD's desire to have all utilities provide consistent analytical data for WSD and stakeholders to compare utilities' programs and their respective progress in mitigation efforts. BVES recognizes that a certain amount of data collection and analytics is necessary to strategically prioritize mitigation measures. And it agrees that it must allocate finite resources to initiatives that most effectively reduce wildfire risks and PSPS incidents in the near term.⁸ But as a practical matter, there is a limit to how much Bear Valley's customers can afford to pay with respect to the entire wildfire mitigation program. When determining the extent and sophistication of Bear Valley's required data collection and analytics, it is respectfully requested that WSD thoughtfully consider the resulting costs and impact on Bear Valley's finite resources. The greater the administrative costs, the smaller the amount of finite funds that will be available to actually implement wildfire mitigation measures in Bear Valley's small service territory.

III. CONCLUSION

In conclusion, BVES appreciates WSD's conditional approval of Bear Valley's 2020 WMP Refile. BVES is committed to working collaboratively with WSD to continue meaningful reduction of utility-related wildfire risk within Bear Valley's very small service territory.

Respectfully submitted

Paul Marconi
President, Treasurer & Secretary
Paul.Marconi@bvesinc.com

Cc: R.18-10-007
wildfiresafetydivision@cpuc.ca.gov

⁸ Draft WSD Action Statement at p. 7.