

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Wildfire Safety Division
California Public Utilities Commission

**COMMENTS OF THE PUBLIC ADVOCATES OFFICE
ON THE BEAR VALLEY ELECTRIC SERVICE 2020
WILDFIRE MITIGATION PLAN**

ANNA YANG
Regulatory Analyst

ALAN WEHRMAN
Utilities Engineer

HENRY BURTON
Program and Project Supervisor

The Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Telephone: (415) 696-7311
E-mail: Henry.Burton@cpuc.ca.gov

DIANA L. LEE
Deputy Chief Counsel

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Telephone: (415) 703-4342
E-mail: Diana.Lee@cpuc.ca.gov

October 19, 2020

PUBLIC ADVOCATES OFFICE

PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 19, 2020

VIA ELECTRONIC MAIL

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

Subject: Comments of the Public Advocates Office on the Bear Valley Electric Service Inc.'s 2020 Wildfire Mitigation Plan

INTRODUCTION

Pursuant to the Wildfire Safety Division's August 26, 2020 Final Action Statement on Bear Valley Electric Service Inc.'s 2020 Wildfire Mitigation Plan,¹ the Public Advocate's Office at the California Public Utilities Commission (Cal Advocates) submits these comments on Bear Valley Electric Service Inc.'s (BVES) new 2020 Wildfire Mitigation Plan (WMP).

In these comments, Cal Advocates makes the following recommendations:

- The WSD should require BVES to provide a plan to inspect the Radford Line prior to re-energization in the fall.
- The WSD should require BVES to perform a study of the potential ignition risk from its proposed battery energy storage system.

II. BACKGROUND

BVES submitted and served a wildfire mitigation plan on February 7, 2020, pursuant to Resolution WSD-001. BVES amended its Wildfire Mitigation Plan on March 6, 2020, and on May 22, BVES served an "Errata" disclosing substantial errors in its WMP submission. Cal Advocates provides these comments on BVES new WMP.

¹ *Wildfire Safety Division Final Action Statement on Bear Valley Electric Service Inc.'s 2020 Wildfire Mitigation Plan*, August 26, 2020, (WSD Final Action Statement), p. 1.

On August 26, 2020, the WSD denied BVES's WMP as submitted and required BVES to submit a new 2020 WMP no later than 60 days from the date of issuance of the Final Action Statement.

BVES submitted a new WMP on September 18, 2020. The Final Action Statement permits stakeholders to submit comments on the new WMP no later than 30 days following its submission.

III. DISCUSSION

A. Summary of BVES's 2020 WMP

BVES, a division of Golden State Water Company, is a small electric utility serving just over 22,000 residential customers in 32 square miles of service territory near Big Bear in the County of San Bernardino, California.² Bear Valley's service territory is mountainous and the entirety of its service area is above 3,000 feet in elevation.³ BVES's entire service territory is designated as HFTD, either Tier 2 or Tier 3. BVES's service territory includes 88 miles of overhead sub-transmission lines, 2.7 miles of underground sub-transmission lines, 489 miles of overhead distribution lines, 89 miles of underground distribution lines, 13 substations, and an 8.4 MW natural gas-fueled peaking generation facility.⁴

B. The WSD should require BVES to provide a plan to inspect the Radford Line prior to re-energization in the fall.

BVES operates infrastructure through the Radford Area, a remote, mountainous, heavily forested region that is primarily accessible only by foot.⁵ BVES de-energizes this infrastructure during the summer months to reduce wildfire risk.⁶ The line remains de-energized for approximately seven months, from April through October.⁷ During that time, the line may become damaged, which could pose an ignition risk when the line is re-energized in the fall.⁸

² https://www.bves.com/media/managed/factsheet/BVES_FACT_SHEET_2019_v3.pdf

³ BVES 2020 WMP, p. 13.

⁴ BVES 2020 WMP, p. 65.

⁵ BVES 2020 WMP, p. 72.

⁶ BVES 2020 WMP, p. 72.

⁷ BVES 2020 WMP, p. 174.

⁸ The Oakmont/Pythian fire, which started in Sonoma County on October 13, 2017, illustrates the potential consequences of failing to conduct proper inspections in advance of reenergizing a line. The

The WMP does not provide specific details on how BVES patrols the line to inspect for damage prior to re-energization.

BVES should submit in its response to party comments its procedures for inspecting the Radford Line prior to re-energization. This plan, at a minimum, should provide for the same level of damage inspections that BVES performs prior to re-energizing circuits following a public safety power shut off (PSPS) event.² BVES should also include this plan in its 2021 WMP update.

C. The WSD should require BVES to perform an ignition risk analysis on its proposed battery energy storage system.

BVES proposes to construct an 8 megawatt (MW) solar energy project, and a 32 MWh lithium-ion battery energy storage system (BESS).¹⁰ One of the purposes of these projects will be to minimize the disruption caused by a de-energization event or PSPS initiated by Southern California Edison Company (SCE) that would de-energize supply lines to BVES.¹¹

In recent years, lithium-ion BESS's have combusted or exploded in multiple countries and use cases.¹² As the entirety of BVES is located within Tier 2 and Tier 3 HFTDs,¹³

Oakmont/Pythian fire stated when a falling tree contacted overhead conductors, which then fell to the ground. These wires ignited a fire when Pacific Gas and Electric Company (PG&E) made the decision to re-energize the overhead conductor. The Safety and Enforcement Division (SED) determined that PG&E's failure to perform a complete patrol prior to reenergizing its system violated General Order 95, Rule 31.1 and "may have directly contributed to the ignition of the Oakmont/Pythian fire." SED Incident Report E20171020-03, May 1, 2019, p. 21.

² BVES 2020 WMP, p. 82.

¹⁰ BVES 2020 WMP, p. 124.

¹¹ BVES 2020 WMP, p. 124.

¹² See e.g., IEEE Spectrum, *Dispute Erupts Over What Sparked an Explosive Li-ion Energy Storage Accident*, <https://spectrum.ieee.org/energywise/energy/batteries-storage/dispute-erupts-over-what-sparked-an-explosive-liion-energy-storage-accident>.

Allianz Global Corporate & Specialty, *Battery Energy Storage Systems (BESS) Using Li-Ion Batteries*, <https://www.agcs.allianz.com/content/dam/onemarketing/agcs/agcs/pdfs-risk-advisory/tech-talks/ARC-Tech-Talk-Vol-26-BESS.pdf>;

Power Engineering, *Catching the thermal runaway: Testing safety of energy storage systems*, <https://www.power-eng.com/2020/06/29/catching-the-thermal-runaway-testing-safety-of-energy-storage-systems/>.

Caroline Thomas Jacobs, Director
Wildfire Safety Division
October 19, 2020
Page 4

the construction of a lithium-ion BESS in this region could introduce a significant potential ignition source.

The WSD should require BVES to perform a study of the potential ignition risk posed by the construction of a BESS within its service territory. BVES should evaluate whether the potential benefit (e.g. service continuity) outweighs the potential risks, given that there has yet to be a situation where an SCE-driven PSPS has de-energized supply lines to BVES. BVES should submit this study in its 2021 WMP update.

IV. CONCLUSION

Cal Advocates respectfully requests that the Wildfire Safety Division adopt the recommendations discussed herein.

Sincerely,

/s/ **NATHANIEL W. SKINNER**
Nathaniel W. Skinner, PhD
Program Manager, Safety Branch

Public Advocates Office
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102
Telephone: (415) 703-1393
E-mail: Nathaniel.Skinner@cpuc.ca.gov

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

¹³ BVES 2020 WMP, p. 61.