

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 22, 2020

Agenda ID #18644

TO: STAKEHOLDERS TO BEAR VALLEY ELECTRIC SERVICE, INC.'s 2020 WILDFIRE MITIGATION PLAN Service List(s): R.18-10-007

Enclosed is the Action Statement of the Wildfire Safety Division (WSD) and Draft Resolution WSD-010. The Action Statement and Draft Resolution WSD-010 deny Bear Valley Electric Service, Inc.'s (BVES) 2020 Wildfire Mitigation Plan (WMP), submitted February 7, 2020, as updated on March 6, 2020 and with errata submitted on May 22, 2020. BVES shall submit a new WMP as detailed in the accompanying documents.

Pursuant to Rule 14.5 of the Commission's Rules of Practice and Procedure, stakeholders may submit comments on the Draft Resolution.

Comments shall be limited to ten (10) pages in length and should list the recommended changes to the Draft Resolution. Comments shall focus on factual, legal or technical errors in the proposed Draft Resolution.

Comments must be received by the Wildfire Safety Division by August 13, 2020. Comments should be submitted to the following email address: wildfiresafetydivision@cpuc.ca.gov. The WSD will consider comments on the Draft Resolutions when finalizing its Action Statement on BVES's 2020 WMP.

Stakeholders submitting comments on the Draft Resolution must also serve their comments on the service list of R.18-10-007. Comments that are not served on the service list of R.18-10-007 may not be considered. The WSD will post all comments received on the following website:

www.cpuc.ca.gov/wildfiremitigationplans.

Replies to comments will not be accepted or considered if submitted.

Draft Resolution WSD-010 will appear on the agenda at the next Commission meeting, which is at least 30 days after the date of this letter. The Commission may vote to ratify the WSD's Draft Resolution at that time or it may postpone a vote until a later meeting.

Sincerely,

/s/CAROLINE THOMAS JACOBS
Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 22, 2020

**Wildfire Safety Division Draft Action Statement on
Bear Valley Electric Service Inc.'s 2020 Wildfire Mitigation Plan**

This Action Statement is the denial of Bear Valley Electric Services Inc.'s (BVES) 2020 Wildfire Mitigation Plan (WMP) submitted on February 7, 2020, amended on March 6, 2020 and May 22, 2020, and is presented to the California Public Utilities Commission (CPUC) for ratification, via the associated Resolution. BVES shall file a new 2020 WMP meeting the requirements set forth herein no later than 60 days from the date of mailing of the accompanying final Resolution. Stakeholders may comment on any matter in the new WMP no later than 30 days following its submission; comments shall be limited to 20 pages.

Introduction and Background

Wildfires have caused significant social, economic, and environmental damage on a global scale. In June 2020, the CPUC approved with conditions the WMPs of the other electrical corporations under its jurisdiction. The CPUC's Wildfire Safety Division (WSD) had mailed a draft Resolution approving BVES' WMP with conditions, but after the May 7, 2020 mailing, on May 22, 2020 BVES served an "errata" disclosing serious errors in its original WMP that rendered moot virtually the entire WSD analysis of BVES' plan.

In its Draft Resolution (draft Resolution WSD-006) and accompanying Draft Action Statement, the WSD raised two key concerns with BVES' WMP. First, the WMP proposed costs that were three times as high, on a normalized basis, as BVES' utility peers. Second, BVES appeared to be proposing undergrounding all of its power lines, an expensive and poorly justified option. Draft Resolution WSD-006 proposed conditions for BVES to remedy these two concerns as well as other concerns.

BVES' errata (attached to the Resolution accompanying this Action Statement as Appendix A) explained that it had committed a fundamental error in its original

WMP by stating that all of its lines would be undergrounded rather than just a portion of one line. This error caused its costs to appear three times as high as those of the other electrical corporations submitting Plans. BVES did not otherwise explain its error.

In response to the errata, the WSD extended its own time for review of the WMP. The WSD cited as authority Public Utilities Code section 8386.3(a), which states that the Division has three months to review and approve or deny an electrical corporation's WMP "unless the division makes a written determination, including reasons supporting the determination, that the three-month deadline cannot be met." The WSD stated it had reviewed BVES' errata and found the changes to be substantive and significant. BVES submitted its errata on May 22, 2020, two weeks after the WSD released Draft Resolution WSD-006. Stakeholders and the public had no opportunity to review or comment on the errata, and WSD had no opportunity to review the errata in detail or consider comments on it. Therefore, the WSD found the three-month deadline in Public Utilities Code section 8386.3(a) could not be met.

Compounding the problem, BVES submitted its initial WMP by the February 7, 2020 deadline using the wrong format, despite notice of the new format and template on December 16, 2019 to all parties to Rulemaking 18-10-007, the WMP formal proceeding. All other electrical corporations successfully submitted their WMPs using the new format by the February 7, 2020 deadline. BVES did not submit a WMP in the correct format until March 6, 2020, almost a month after it was due. BVES used a consultant (Navigant) for its submissions.

Discussion of WMP Assessment

BVES is a small utility, and the WSD does not take a decision to deny its WMP lightly. However, BVES' conduct demonstrates a serious problem with its quality control, its understanding of its own wildfire mitigation initiatives, and the WMP process. Use of a consultant to prepare documents does not relieve a regulated entity of the obligation to submit accurate information to the consultant, check the consultant's work, verify it is accurate, and submit material to the Commission and the WSD that meets statutory and regulatory requirements. Had the WSD not found the errors in BVES' WMP, it is not clear BVES would

have ever discovered or corrected them on its own. In the WSD's view, BVES' conduct demonstrates lack of organizational control and leadership and calls into question management's understanding of its own strategic direction on wildfire mitigation initiatives.

WSD reviewed all 2020 WMPs for compliance with statute, the WSD's guidance served on all electrical corporations with the Rulemaking 18-10-007 Administrative Law Judge's December 16, 2019 Ruling, and with the following criteria:

- Completeness: The WMP is complete and comprehensively responds to the WMP requirements,
- Technical feasibility and effectiveness: Initiatives proposed in the WMP are technically feasible and are effective in addressing the risks that exist in the utility's territory,
- Resource use efficiency: Initiatives are an efficient use of utility resources, and
- Forward looking growth: The utility is targeting maturity growth.

BVES' February 7, 2020 WMP, as amended March 6, 2020 and May 22, 2020, fails the "Completeness" requirement.

In view of BVES' conduct, the WSD is denying the WMP as submitted. BVES shall submit a new 2020 WMP no later than 60 days from the date of mailing of the accompanying final Resolution ratified by the Commission. BVES' new WMP shall reflect the changes in the errata, to the extent it is still accurate. BVES is strongly urged to also address Class A and Class B deficiencies that the WSD found in BVES' original WMP, as set forth in Appendices B and C to the accompanying Resolution. BVES shall check every aspect of the new WMP to ensure completeness and accuracy prior to submission and shall submit a sworn attestation by the most senior officer responsible for BVES' WMP as to the new WMP's completeness and accuracy.

The WSD expects BVES to make immediate improvements to its internal processes to ensure the quality and accuracy of its wildfire mitigation work, reporting, and regulatory submissions. As a separate supplemental filing

submitted concurrent with its new WMP, BVES shall provide a full and detailed explanation of how and why the errors leading to the errata were made. The explanation must include, but is not limited to, what caused the errors, how BVES reviewed the consultant's work products before submission to the WSD, how much BVES paid for the consultant's work product(s), and a description of what changes BVES is making to avoid such significant failures in the future.

The WSD expects BVES to submit complete and accurate documentation on time and within the parameters set forth in the Public Utilities Code, Commission decisions, orders, and rulings and guidance.

Sincerely,

/s/ CAROLINE THOMAS JACOBS

Caroline Thomas Jacobs

Director, Wildfire Safety Division

California Public Utilities Commission

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Resolution WSD-010
Wildfire Safety Division
[Date]

R E S O L U T I O N

Resolution Ratifying the Action of the Wildfire Safety Division
Denying Bear Valley Electric Service's 2020 Wildfire Mitigation Plan
Pursuant to Public Utilities Code Section 8386.

This Resolution ratifies the attached action of the Wildfire Safety Division (WSD) denying Bear Valley Electric Service Inc.'s (BVES) 2020 Wildfire Mitigation Plan (WMP) submitted on February 7, 2020, updated March 6, 2020, and made the subject of an errata by BVES on May 22, 2020 (BVES Errata). BVES submitted its errata after a Draft Action Statement and Draft Resolution mailed on May 7, 2020 to BVES and the public approving the WMP with conditions. BVES' Errata made fundamental changes to its WMP that rendered the prior drafts unusable.

BVES' lack of care and numerous, substantial corrections necessitates the WSD restart the process with a new WMP. The new WMP shall be filed no later than 60 days from the date of the California Public Utilities Commission's (Commission) mailing of the accompanying final Resolution. BVES shall correct the matters identified in the BVES Errata to the extent they are still accurate. BVES is strongly urged to also address Class A and Class B deficiencies the WSD found in Draft Action Statement and Draft Resolutions WSD-006 and WSD-002,¹ mailed on May 7, 2020, as set forth in Appendices B and C (and explained in Appendix D) to this Resolution. To address Class A and B deficiencies, BVES should include submission of a Remedial Compliance Plan along with its

¹ Resolution WSD-006 has now been withdrawn from the Commission's agenda; it is appended here for explanatory purposes only as Appendix D.

new WMP as well as information required in the first Quarterly Report.² BVES shall also check every aspect of the new WMP it submits to ensure completeness and accuracy and include a sworn verification by the most senior official responsible for BVES' WMP as to the new WMP's completeness and accuracy.

BVES' Errata (attached to this Resolution as Appendix A) explained that the utility had committed a fundamental error in its original WMP by stating that all of its lines would be undergrounded rather than just a portion of one line. In addition, BVES used a different methodology to calculate costs than that specified in the December 16, 2019 Administrative Law Judge ruling in Rulemaking 18-10-007. These errors caused its costs to appear three times as high as those of the other electrical corporations submitting Plans. BVES did not otherwise explain its error.

Because BVES' costs as originally submitted appeared three times as high as its peer utilities, the original draft Action Statement and Resolution WSD-006 contained extensive analysis to remedy BVES' status as an outlier. When it submitted the Errata, all of that analysis was rendered moot. Hence, stakeholders, the WSD and the Commission extended significant effort in response to an erroneous submission.

The Commission and the WSD's most important responsibility is ensuring the safety of Californians. BVES should demonstrate the same commitment. BVES' conduct demonstrates a serious problem with its quality control, its understanding of its own wildfire mitigation initiatives and the WMP process. Use of a consultant to prepare documents does not relieve a regulated entity of the obligation to submit accurate information to the consultant, check the consultant's work, verify it is accurate, and submit material to the Commission and the WSD that meets statutory and regulatory

² See Resolution WSD-002 for an explanation of Remedial Compliance Plans and Quarterly Reports. BVES may address all Class C deficiencies in its 2021 WMP Update consistent with the other electrical corporations.

requirements. Had the WSD not found the errors in BVES' WMP, it is not clear BVES would have ever discovered or corrected them on its own. It is also unclear whether BVES' Errata captures all errors in the WMP or only those brought to light by the WSD's evaluation. BVES' lack of care raises concern about its attention to detail and understanding of its own wildfire mitigation initiatives.

This Resolution therefore denies BVES' WMP submitted on February 7, 2020, resubmitted on March 6, 2020, and its Errata submitted on May 22, 2020. This denial is made pursuant to Public Utilities Code sections 8386 et seq. and 701.

The WSD expects BVES to make immediate improvements to its internal processes to ensure the quality and accuracy of its wildfire mitigation work, reporting, and regulatory submissions. As a separate supplement filing submitted concurrent with its new WMP, BVES shall provide a full and detailed explanation of how and why these errors were made. The explanation must include, but is not limited to, what caused the errors, how BVES reviewed the consultant's work products before submission to the WSD, how much BVES paid for the consultant's work product(s), and a description of what changes BVES is making to avoid such significant failures in the future.

1. Discussion

The WSD denies BVES' 2020 WMP as submitted. The Commission has reviewed the denial the WSD prepared pursuant to Public Utilities (Pub. Util.) Code Section 8386.3 and ratifies the denial. BVES shall submit a new WMP no later than 60 days from the date of Commission mailing of the final Resolution. Until BVES receives approval or conditional approval of its updated 2020 WMP by the WSD and subsequent ratification by the Commission, BVES will be without an approved 2020 WMP.

The original Draft Resolution on BVES' WMP mailed on May 7, 2020 found the following problems, discussed in more detail in Appendices B, C and D to this Resolution:

- 1) *Disproportionate spending when compared to other electrical corporations.* On a normalized basis, BVES is spending three times the amount per circuit mile as the large electrical corporations on wildfire mitigation and many times more than its peer small and multijurisdictional electrical corporations without justification of why such expense is justified. Combined with BVES' failure to complete 2019 mitigation, we are concerned that BVES' approach to wildfire mitigation may not be adequate. BVES' Errata changed this portion of its earlier WMP.
- 2) *Delays in completing prior mitigation promised.* BVES reports limited progress on certain mitigation promised in its 2019 WMP. For example, BVES is off target on LiDAR surveys (vegetation management), removal of conductor strung on live trees and replacement of expulsion fuses that spark and cause ignition (system hardening).
- 3) *Lack of PSPS planning and readiness.* BVES has not called a PSPS event but appears to have some risk of such an action due to its interconnectedness with Southern California Edison's (SCE) power lines. It must have a plan for keeping the public informed and safe in the event a PSPS occurs.
- 4) *Deficiencies.* BVES' WMP lacked a great deal of required information, listed as "deficiencies" in the original Draft Resolution in Appendix D.

Therefore, the WSD's draft approval of BVES' WMP identified a number of deficiencies and imposed corresponding conditions.

WSD reviewed all 2020 WMPs for compliance with statute, the WSD's guidance served on all electrical corporations with the Rulemaking 18-10-007 Administrative Law Judge's December 16, 2019 Ruling, and with the following criteria:

- **Completeness:** The WMP is complete and comprehensively responds to the WMP requirements,

- Technical feasibility and effectiveness: Initiatives proposed in the WMP are technically feasible and are effective in addressing the risks that exist in the utility's territory,
- Resource use efficiency: Initiatives are an efficient use of utility resources, and
- Forward looking growth: The utility is targeting maturity growth.

BVES' February 7, 2020 WMP, as amended March 6, 2020 and May 22, 2020, fails the "Completeness" requirement. BVES failed to submit a comprehensive and complete WMP on two separate occasions: first on February 7, 2020, where BVES' submitted its WMP using the 2019 format, therefore failing to include required information, and again on March 6, 2020, where BVES submitted an incorrect WMP that was the subject of the BVES Errata submitted on May 22, 2020.

Submission of BVES' Errata on May 22, 2020 does not satisfy the criteria of completeness because BVES submitted its Errata after issuance of the May 7, 2020 Draft Action Statement and Draft Resolution. Further, the WSD does not know whether BVES' Errata addresses all errors in BVES' WMP or only those that came to light in Draft Resolution WSD-006. Stated differently, the WSD is not assured that BVES has undertaken a complete and thorough review of its WMP submission to capture all errors in its Errata or whether its review extended only to those areas identified as Deficiencies in Draft Resolution WSD-006. For these reasons, the WSD cannot make a finding of completeness based on the information submitted by BVES.

Within 60 days of mailing of the final Resolution by the Commission, BVES must submit a new WMP. BVES is strongly urged to address the Class A and Class B deficiencies³ that the WSD found in BVES' original WMP, as set forth in Appendix B and Appendix C to this Resolution. Addressing the deficiencies not related to the errata will speed up review of BVES' plan. To address Class A and B deficiencies, BVES is strongly urged to submit a Remedial Compliance Plan

³ BVES may address Class C deficiencies in its 2021 WMP Update, consistent with direction provided to other electrical corporations in Resolution WSD-002.

along with its new WMP as well as the information required in the first Quarterly Report.⁴

BVES shall address the matters in the BVES Errata, to the extent the information presented in the BVES Errata is complete and correct.

The WSD expects BVES to make immediate improvements to its internal processes to ensure the quality and accuracy of its wildfire mitigation work, reporting, and regulatory submissions. In a separate supplemental filing submitted concurrent with its WMP, BVES shall also provide a full and detailed explanation of how and why these errors were made. The explanation must include, but is not limited to, what caused the errors, how BVES reviewed the consultant's work products before submission to the WSD, how much BVES paid for the consultant's work product(s), and a description of what changes BVES is making to avoid such significant failures in the future. Finally, BVES shall also check every aspect of the new WMP it submits to ensure completeness and accuracy and include a sworn verification by the senior most official responsible for approval of BVES' WMP as to the new WMP's completeness and accuracy.

2. Impact of COVID-19 Pandemic

After BVES submitted its WMP, California Governor Gavin Newsom signed Executive Order N-33-20 requiring Californians to stay at home to combat the spread of the COVID-19 virus. Specifically, Governor Newsom required Californians to heed the order of the California State Public Health Officer and the Director of the California Department of Public Health that all individuals living in California stay home or at their place of residence, except as needed to maintain continuity of operation of the federal critical infrastructure sectors, in order to address the public health emergency presented by the COVID-19 disease (stay-at-home order).⁵

⁴ See Resolution WSD-002 for an explanation of Remedial Compliance Plans and Quarterly Reports. BVES may address all Class C deficiencies in its 2021 WMP Update consistent with the other electrical corporations.

⁵ Executive Order N-30-20. Available at <http://covid19.ca.gov/img/Executive-Order-N-30-20.pdf>.

As articulated in the March 27, 2020 joint letters⁶ of the WSD, CAL FIRE and the California Governor's Office of Emergency Services regarding essential wildfire and PSPS mitigation work during COVID-19 sent to each electrical corporation, electrical corporations are expected to continue to prioritize essential safety work. The WSD expects the electrical corporations to make every effort to keep WMP implementation progress on track, including necessary coordination with local jurisdictions. Such effort is essential to ensuring that electrical corporations are prepared for the upcoming and subsequent wildfire seasons, while complying with COVID-19 restrictions requiring residents to shelter-in-place, practice social distancing, and comply with other measures that California's public health officials may recommend or that Governor Newsom or other officials may require in response to the COVID-19 pandemic.

Furthermore, the WSD expects the electrical corporations to continue to make meaningful progress on PSPS mitigation goals, including continuing with sectionalization projects, local outreach and coordination, establishing customer resource centers, and microgrid projects. In addition, electrical corporations are expected to undertake any other critical work related to operating a safe and reliable grid and to mitigate wildfire and/or PSPS risk.

3. Conclusion

BVES' Errata so fundamentally changed the nature of its capital spending and undergrounding plans and demonstrated a significant lack of quality control, leadership and management within BVES that it is prudent to deny BVES' 2020 WMP, submitted February 7, 2020, amended March 6, 2020 and further amended May 22, 2020.

Comments

Pub. Util. Code § 311(g)(1) provides that resolutions must be served on all parties and subject to at least 30 days public review. However, given that this resolution is issued outside of a formal proceeding, interested stakeholders need not have

⁶ <https://www.cpuc.ca.gov/covid/>. Letters to each electrical corporation are found under the heading "Other CPUC Actions", March 27, 2020: Joint Letters to IOUs re: Essential Wildfire and PSPS Mitigation Work.

party status in Rulemaking (R.) 18-10-007 in order to submit comments on the resolution. Please note that comments are due 20 days from the mailing date of this resolution. Replies will not be accepted.

This draft resolution was served on the service list of R.18-10-007 and posted on the Commission's website, www.cpuc.ca.gov/wildfiremitigationplans, and it will be placed on the Commission's agenda no earlier than 30 days from today.

Findings

1. BVES submitted its WMP on February 7, 2020, but it used a format BVES followed in 2019, rather than the format required in the December 16, 2019 ruling in R.18-10-007. BVES used the proper format in its March 6, 2020 WMP submission.
2. Assembly Bill (AB) 1054 and Commission Resolution WSD-001 require BVES to file a WMP for 2020 that conforms with Pub. Util. Code § 8386(c) and guidance provided by the WSD and served on the R.18-10-007 service list on December 16, 2019 by Administrative Law Judge ruling.
3. BVES submitted an Errata on May 22, 2020 that fundamentally changed the capital spending and undergrounding plans in its March 6, 2020 WMP and rendered moot the analysis of that WMP.
4. BVES' 2020 WMP fails to satisfy Pub. Util. Code § 8386 *et seq.*
5. BVES' WMP fails to satisfy WSD's criteria requiring that a WMP be complete and comprehensively respond to the WMP requirements.
6. Appendix B contains findings regarding deficiencies in the February 7, 2020 BVES WMP, as amended March 6, 2020.
7. Appendix C contains conditions that apply to all electrical corporations and require correction this year.
8. Appendix D contains explanation of the conditions in Appendices B and C and is attached for informational purposes only.
9. BVES should be required to remedy the matters in the BVES Errata.
10. BVES should be strongly urged to cure the deficiencies identified by the WSD with regard to BVES' February 7, 2020 WMP, as amended March 6, 2020. Addressing those matters now will speed review of BVES' new WMP.
11. Ratification of the Wildfire Safety Division's denial of Bear Valley Electric Service's 2020 Wildfire Mitigation Plan is appropriate.

THEREFORE, IT IS ORDERED THAT:

1. The Wildfire Safety Division's denial of Bear Valley Electric Service, Inc.'s 2020 Wildfire Mitigation Plan is hereby ratified.
2. Bear Valley Electric Service, Inc.'s pending Wildfire Mitigation Plan is denied. Bear Valley Electric Service, Inc. is without an approved 2020 Wildfire Mitigation Plan.
3. Bear Valley Electric Service, Inc. shall submit a new Wildfire Mitigation Plan no later than 60 days from the date of Commission mailing of this final Resolution addressing the matters in Bear Valley Electric Service, Inc.'s May 22, 2020 Errata, to the extent they are still accurate.
4. Bear Valley Electric Service, Inc. is strongly urged to satisfy the Class A and Class B conditions set forth in Appendices B and C to this Resolution, as explained in Appendix D. To address Class A and B deficiencies, Bear Valley Electric Service, Inc. is strongly urged to submit a Remedial Compliance Plan along with its new Wildfire Mitigation Plan as well as the information required in the first Quarterly Report (See Resolution WSD-002 for an explanation of Remedial Compliance Plans and Quarterly Reports). Bear Valley Electric Service, Inc. may address Class C conditions in its 2021 Wildfire Mitigation Plan Update.
5. With its new Wildfire Mitigation Plan submission, Bear Valley Electric Service, Inc. shall provide a full and detailed explanation of how and why the errors leading to incorrect submissions on February 7, 2020 and March 6, 2020 were made. The explanation must include, but is not limited to, what caused the errors, how Bear Valley Electric Service, Inc. reviewed the consultant's work products before submission to the Wildfire Safety Division, how much Bear Valley Electric Service, Inc. paid for the consultant's work product(s), and a description of what changes Bear Valley Electric Service, Inc. is making to avoid such significant failures in the future. Bear Valley Electric Service, Inc. shall also check every aspect of the new Wildfire Mitigation Plan it submits to ensure completeness and accuracy and include a sworn verification by the most senior official responsible for Bear Valley Electric Service's Wildfire Mitigation Plan as to the new Wildfire Mitigation Plan's WMP completeness and accuracy.
6. Stakeholders may submit comment on any matter in Bear Valley Electric Service, Inc.'s new Wildfire Mitigation Plan no later than 30 days following

submission. Comments shall be limited to 20 pages and must be submitted to the Director of the Wildfire Safety Division at wildfiresafetydivision@cpuc.ca.gov with a copy to CALFIREUtilityFireMitigationUnit@fire.ca.gov. Stakeholders must also serve comments on the service list of Rulemaking 18-10-007.

7. Nothing in this Resolution should be construed as approval of the costs associated with Bear Valley Electric Service Inc.'s Wildfire Mitigation Plan mitigation efforts.
8. Bear Valley Electric Service shall submit a letter to the Wildfire Safety Division containing any updates to scope, timing or other aspects of any mitigation set forth in its Wildfire Mitigation Plan as result of the COVID-19 pandemic, including Public Safety Power Shutoff. The letter shall list items using the same names and sections used in the Wildfire Mitigation Plan and give a thorough description of why the COVID-19 pandemic requires the specified action. The letter shall be submitted within 60 days of issuance of this Resolution and shall be addressed to the Director of the Wildfire Safety Division. The letter shall be emailed to wildfiresafetydivision@cpuc.ca.gov with service on the service list of Rulemaking 18-10-007. If there are no changes to report, no such submission is required.
9. Nothing in this Resolution should be construed as a defense to any enforcement action for a violation of a Commission decision, order, or rule.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on _____; the following Commissioners voting favorably thereon:

Alice Stebbins
Executive Director

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

RESOLUTION WSD-010 Resolution Ratifying Action of the Wildfire
Safety Division on Bear Valley Electric Service's 2020 Wildfire
Mitigation Plan Pursuant to Public Utilities Code Section 8386.

INFORMATION REGARDING SERVICE

I have electronically served all persons on the attached official service list
who have provided an e-mail address for R.18-10-007.

Upon confirmation of this document's acceptance for filing, I will cause a
Notice of Availability of the document to be served by U.S. mail on all parties
listed in the "Party" category of the official service list for whom no e-mail
address is provided.

The official service list I use is current as of today's date.

Dated July 22, 2020, at San Francisco, California.

/s/ GABRIELA PEREZ

Gabriela Perez

N O T I C E

Persons should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address to ensure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

The Commission's policy is to schedule hearings (meetings, workshops, etc.) in locations that are accessible to people with disabilities. To verify that a particular location is accessible, call: Calendar Clerk (415) 703-1203.

If specialized accommodations for the disabled are needed, e.g., sign language interpreters, those making the arrangements must call the Public Advisor at (415) 703-2074 or TDD# (415) 703-2032 five working days in advance of the event.

***** SERVICE LIST *****

Last Updated on 22-JUL-2020 by: KB3
R1810007 LIST

***** PARTIES *****

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***** SERVICE LIST *****

**Last Updated on 22-JUL-2020 by: KB3
R1810007 LIST**

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