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PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Wildfire Safety Division **RESOLUTION WSD-022**
September 9, 2021

R E S O L U T I O N

RESOLUTION WSD-022 Resolution Ratifying Action of the Office of Energy Infrastructure Safety on Bear Valley Electric Service, Inc.'s 2021 Wildfire Mitigation Plan Update Pursuant to Public Utilities Code Section 8386.

This Resolution ratifies the attached Action Statement (Appendix A) of the Office of Energy Infrastructure Safety (Energy Safety)[1] approving Bear Valley Electric Service, Inc.'s (BVES, or electrical corporation) 2021 Wildfire Mitigation Plan (WMP) Update (2021 WMP Update) pursuant to Public Utilities Code Section 8386.

Ensuring the safety of Californians is a central responsibility of the California Public Utilities Commission (Commission) and Energy Safety. Since several catastrophic wildfires in the San Diego area in 2007, the equipment of large electric utilities the Commission regulates has been implicated in the most devastating wildfires in our state's history. The California Legislature enacted several measures requiring electrical corporations to submit, and Energy Safety to review, approve, or otherwise act on, WMPs designed to reduce the risk of utility-related catastrophic wildfire. Key among the legislative measures are Senate Bill 901 (2018), Assembly Bill 1054 (2019), and Assembly Bill 111 (2019), discussed in detail below.

[1] Because the Wildfire Safety Division (WSD) transitioned to the Office of Energy Infrastructure Safety (Energy Safety) on July 1, 2021, any references herein to WSD actions that post-date this transition should be interpreted as actions taken by Energy Safety. WSD is used to describe the work of the WSD prior to July 1, 2021. Energy Safety is used to describe the work of Energy Safety beginning on July 1, 2021. Any references to WSD action post July 1, 2021 or to Energy Safety action prior to July 1, 2021 are inadvertent and should be interpreted as the actions of WSD or Energy Safety as appropriate. Section 10 of this Resolution provides further detail on the transition of the WSD to Energy Safety.

This Resolution acts on BVES's WMP Update and Update Revision submitted on March 5, 2021 and June 3, 2021, respectively. BVES's WMP, submitted in 2020, responds to a list of 22 requirements set forth in Public Utilities Code Section 8386. The WMP covered the three-year period of 2020-2022 and focused on measures the electrical corporation will take to reduce the risk of, and impact from, a catastrophic wildfire related to its electrical infrastructure and equipment. BVES's 2021 WMP Update provides information on BVES's progress over the past year as well as updates to its 2021 and 2022 projections. In addition, the 2021 WMP Update responds to additional requirements and metrics approved by the Commission in Resolution WSD-011.

In ratifying BVES's 2021 WMP Update, the Commission acts on Energy Safety's Action Statement and its analysis in terms of the extent to which BVES's wildfire mitigation efforts objectively reduce wildfire risk and drive improvement and based on the comments from the Wildfire Safety Advisory Board, the public and other stakeholders.

THE PROPOSED OUTCOME:

- Ratifies the attached action of Energy Safety to approve the 2021 WMP Update of BVES.
- Evaluates the maturity of BVES's 2021 WMP Update using the Energy Safety's Utility Wildfire Mitigation Assessment, as represented in the Utility Wildfire Mitigation Maturity Model. Final Maturity Model outputs should be viewed as levels or thresholds—they are not absolute scores.
- Requires BVES to submit an update to its WMP in 2022 according to a forthcoming schedule to be released by Energy Safety.
- Does not approve costs attributable to WMPs, as statute requires electrical corporations to seek and prove the legitimacy of all expenditures at a future time in their General Rate Cases (GRC) or application for cost recovery. Nothing in this Resolution or Energy Safety's Action Statement should be construed as approval of any WMP-related costs.

- Does not establish a defense to any enforcement action for a violation of a Commission decision, order, or rule.

SAFETY CONSIDERATIONS:

Mitigation of catastrophic wildfires in California is among the most important safety challenges the Commission-regulated electrical corporations face. Comprehensive WMPs are essential to safety because:

- WMPs articulate an electrical corporation's understanding of its utility-related wildfire risk and the proposed actions to reduce that risk and prevent catastrophic wildfires caused by utility infrastructure and equipment. By implementing measures such as vegetation management, system hardening (such as insulating overhead lines and removing or upgrading equipment most likely to cause fire ignition), grid topology improvements (such as installation and operation of electrical equipment to sectionalize or island portions of the grid), improving asset inspection and maintenance, situational awareness (such as cameras, weather stations, and use of data to predict areas of highest fire threat), improving community engagement and awareness, and other measures, utility-related catastrophic wildfire risk should be reduced over time.

- The substantive and procedural changes enacted by Energy Safety and the Commission in the evaluation of the electrical corporations' 2021 WMP Updates will enhance California's ability to mitigate utility-related catastrophic wildfire risk. Below is a summary of the key new requirements in the 2021 process required of all utilities submitting a WMP Update. In 2021, WMP Updates were required to:

    - Include a checklist of the 22 Public Utilities Code Section 8386(c) requirements to assist Energy Safety staff in locating the sections that meet these requirements.
    - Be more granular overall to help Energy Safety staff better understand resource allocation, local community conditions

and other detailed information previously requested at a more aggregated level.

- Provide more details showing how utilities are mitigating the impact of wildfires and PSPS on vulnerable, marginalized, and at-risk communities.
- Report the utility's methodology for calculating the increase costs to ratepayers.
- Report the details of the utility's methods for modeling ignition probability.
- Report the utility's process for calculating specific metrics including Red Flag Warning and High Wind Warning overhead circuit mile days, the Access and Functional Needs population, the wildland urban interface (WUI) territory, and highly rural, rural, and urban territories.
- Include a narrative explaining the qualifications of certain utility workers in roles related to wildfire & PSPS mitigation.
- Include more granular geospatial data to provide metrics at a local level.
- Include more refinement in progress and outcome metrics (e.g., inspection effectiveness, risk events).
- Include an explanation wherever the utility could not disaggregate financial spend activities.
- Include citations to relevant state and federal statutes, orders, and proceedings.

ESTIMATED COST:

- Costs are not considered in this Resolution, as Public Utilities Code Section 8386.4(b) provides for Commission cost review in a utility General Rate Case or, in some cases, a separate application. Nothing in this Resolution should be construed as approval of the costs associated with the WMP mitigation efforts.
- For illustrative purposes, Table 1 below contains BVES's actual costs for 2020 and its projected costs for the implementation of wildfire mitigation efforts in its 2021 WMP Update.

- BVES may not record the same costs more than once or in more than one place, seek duplicative recovery of costs, or record or seek to recover costs in the memorandum account already recovered separately. All electrical corporations should ensure they carefully document their expenditures in these memorandum accounts by category and be prepared for Commission review and audit of the accounts at any time.

Table 1: BVES's WMP Costs

Proposed 2020 costs (as reported in the 2020 WMP)	$14,379,000
Actual 2020 costs (as reported in the 2021 WMP Update)	$18,810,000
Difference between 2020 proposed/actual costs (+/-)	+$4,431,000
Proposed 2021 costs	$23,649,000
Proposed 2022 costs	$14,502,000
Proposed total costs 2020-2022	$56,961,000

1. Summary

This Resolution ratifies the attached Office of Energy Infrastructure Safety (Energy Safety) Action Statement approving the 2021 Wildfire Mitigation Plan (WMP) Update submitted by Bear Valley Electric Service, Inc. (BVES) on February 5, 2021 (Attachment A), and augmented by the June 4, 2021 WMP Update Revision.[2] The Commission finds that BVES is in compliance with the requirements for WMPs set forth in Assembly Bill (AB) 1054,[3] codified at Public Utilities Code (Pub. Util. Code) Section 8386(c) and the WMP Guidelines issued by the Commission to electrical corporations in Resolution WSD-011.[4] Pub. Util. Code Section 8386(c) requires that electrical corporations' WMPs contain 22 elements; the full list of elements appears in Section 6.1 in this Resolution. Energy Safety's approval and the Commission's ratification do not relieve the electrical corporation from any and all otherwise applicable permitting, ratemaking, or other legal and regulatory obligations.

2. Background, Procedural Background and Legal Authority

Catastrophic wildfires in 2017-19 led the California Legislature to pass Senate Bill (SB) 901[5] in 2018 and its successor AB 1054, as well as AB 111 in 2019.[6] AB 111 established a new division, the Wildfire Safety Division (WSD), within the Commission. Pursuant to Pub. Util. Code Section 326(b), on July 1, 2021, the Wildfire Safety Division transitioned from the Commission into the Office of Energy Infrastructure Safety (Energy Safety) under the California Natural Resources Agency. SB 901 and AB 1054 contain detailed requirements for electrical corporations' WMPs and provide Energy Safety three months to review the WMPs. The duties of Energy Safety are contained in Pub. Util. Code Section 326(a) and include the requirement to evaluate, oversee, and enforce electrical corporations' compliance with wildfire safety requirements and develop and recommend to the Commission performance metrics to achieve maximum feasible wildfire risk reduction.

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[2] BVES's Revised 2021 WMP Update can be found at https://energysafety.ca.gov/what-we-do/wildfire-mitigation-and-safety/wildfire-mitigation-plans/2021-wmp/

[3] Stats of 2019, Ch. 79.

[4] The Commission adopted Resolution WSD-011 on November 19, 2020.

[5] Stats of 2019, Ch 626.

[6] Stats of 2019, Ch 81.

SB 901 requires electrical corporations to annually prepare and submit a WMP to the Commission for review; the Commission reviewed the 2019 WMPs in Rulemaking (R.) 18-10-007. After the Commission issued its WMP decisions on May 30, 2019,[7] the Legislature enacted AB 1054. AB 1054 contains similar WMP requirements to SB 901 but allows WMPs a three-year rather than one-year duration. AB 1054 requires Energy Safety to review and approve or deny electrical corporations' WMPs, with Commission ratification of any approval to follow thereafter. AB 1054 establishes a Wildfire Safety Advisory Board (WSAB) with appointees from the California Governor and Legislature to provide comment on the WMPs and develop and make recommendations related to the metrics used to evaluate WMPs in 2021 and beyond.[8]

Building on lessons learned from the WMP review process in 2019, the WSD developed and required all electrical corporations to conform their WMPs to a set of new WMP Guidelines starting in 2020.[9] In 2020 electrical corporations submitted comprehensive WMPs covering a three-year period from 2020-2022. The WSD evaluated each electrical corporation's WMP and issued dispositions, ratified by the Commission, in Resolutions WSD-002 through WSD-010.

For 2021, the WMP Guidelines as adopted in Resolution WSD-011 build on the detail, data, and other supporting information provided in the 2020 WMPs and enable the electrical corporation to provide updated information for the 2020-2022 cycle period. The 2021 WMP Guidelines are designed to (1) increase standardization of information collected on electrical corporations' wildfire risk exposure, (2) enable systematic and uniform review of information each electrical corporation submits, and (3) move electrical corporations toward an effective long-term wildfire mitigation strategy with systematic tracking of improvements over time. The WSD designed the 2021 WMP Guidelines to require that each electric corporation have a WMP that contains all elements required by AB 1054. For example, every WMP must contain plans for vegetation management, system hardening, inspections of assets and vegetation, situational awareness, reduction and management of Public Safety Power Shutoff (PSPS) events, customer and first responder outreach and coordination, risk analysis, and geographic

[7] Decisions 19-05-036, -037, -038, -039, -040, and -041 (May 30, 2019).

[8] Pub. Util. Code Section 8386.3 (Wildfire Safety Division), § 326.1 (Wildfire Safety Advisory Board).

[9] A ruling issued on December 19, 2019, in proceeding R.18-10-007 described and attached all of the materials electrical corporations were required to use in submitting their 2020 WMPs.

information system (GIS) data, as well as a short- and long-term vision, an ignition cause analysis, and many other elements.

In addition to adopting guidelines for the review of 2021 WMPs, Resolution WSD-011 sets forth the process for the WSD's and the Commission's review of the electrical corporations' 2021 WMP submissions. The resolution called for Pacific Gas and Electric Company (PG&E), Southern California Edison Company, (SCE) and San Diego Gas & Electric Company (SDG&E) (the large electrical corporations) to submit their 2021 WMP Updates on February 5, 2021. The resolution called for PacifiCorp, Bear Valley Electric Service, Inc. (BVES), and Liberty Utilities (the small and multijurisdictional electrical corporations, or SMJUs), and the Trans Bay Cable, LLC, Horizon West Transmission, LLC (the independent transmission operators or ITOs) to submit their WMP Updates on March 5, 2021. BVES timely submitted its 2021 WMP Update.

Shortly after electrical corporations submitted their WMP Updates, the WSD held technical workshops on February 22 and 23, 2021, for the large electrical corporations and March 23, 2021 for the SMJUs and ITOs. The workshops covered topics such as risk management, system design and grid hardening, and efforts to reduce the scale, scope, and frequency of PSPS events.[10] Stakeholders submitted comments on the large electrical corporations' 2021 WMP Updates by March 29, 2021, with replies by April 13, 2021. The WSD accepted comments on the SMJU/ITO 2021 WMP updates until April 14, 2021, with replies by April 21, 2021.

Additionally, WSD required BVES to provide a Revision to its 2021 WMP Update, which it did on June 4, 2021. Comments were accepted on this Revision on June 10, 2021 and June 16, 2021.

Notice

In accordance with Pub. Util. Code Section 8386(d), notice of BVES's 2021 WMP Update was given by posting the WMP Update on Energy Safety's web page at https://energysafety.ca.gov/what-we-do/wildfire-mitigation-and-safety/wildfire-mitigation-plans/. Further, the electrical corporation served its 2021 WMP Update on the Commission's R.18-10-007 service list, as Resolution WSD-001 requires. Resolution WSD-001 also requires an electrical corporation to

[10] Details of the workshops appear on the Office of Energy Infrastructure Safety's website, located at https://energysafety.ca.gov/events-and-meetings/workshops/.

post all data request responses and any document referenced in its WMP on its own websites. It additionally requires an electrical corporation to notify the R.18-10-007 service list about its website updates on a weekly basis.

3. Energy Safety Analysis of WMP Updates

To reach a conclusion about each WMP, Energy Safety reviews each electrical corporation's WMP (including tabular and GIS data), as well as input and comments from WSAB, California Department of Forestry and Fire Protection (CAL FIRE) and stakeholders, responses to data requests, responses to the Maturity Model survey questions, and responses to ongoing reporting required in the 2020 WMP decisions and follow-on submissions.

For 2021, Energy Safety amended its review process such that it will no longer issue conditional approvals. Instead, where Energy Safety found critical issues with 2021 submissions, Energy Safety issued a Revision Notice requiring the electrical corporation to remedy such issues prior to completion of the 2021 WMP Update evaluation. Upon receipt of the electrical corporation's response to the Revision Notice, Energy Safety determined whether the response was sufficient to warrant approval of the WMP Update, or the response was deemed insufficient such that denial of the WMP Update was warranted.

Energy Safety evaluated 2021 WMP Updates according to the following factors:

- Completeness: The WMP Update is complete and comprehensively responds to the WMP statutory requirements and WMP Guidelines.
- Technical feasibility and effectiveness: Initiatives proposed in the WMP Update are technically feasible and are effective in addressing the risks that exist in the electrical corporation's service territory.
- Resource use efficiency: Initiatives are an efficient use of resources and focus on achieving the greatest risk reduction at the lowest cost.
- Year-over-year progress: The electrical corporation has demonstrated sufficient progress on objectives and program targets reported in the prior annual WMP.
- Forward-looking growth: The electrical corporation demonstrates a clear action plan to continue reducing utility-related wildfires and the scale, scope, and frequency of PSPS events. In addition, the electrical corporation is sufficiently focused on long-term strategies to build the overall maturity

of its wildfire mitigation capabilities while reducing reliance on shorter-term strategies such as PSPS and vegetation management.

4. Wildfire Safety Advisory Board Input

The WSAB provided recommendations on the WMP Updates of PG&E, SCE, and SDG&E on April 16, 2021. The WSAB provided recommendations on the WMP Updates of PacifiCorp, BVES, and Liberty Utilities on May 13, 2021. Energy Safety considered the WSAB's recommendations, and the attached Action Statement incorporates the WSAB's input throughout.

5. Public and Stakeholder Comment

The following organizations submitted comments by April 14, 2021, and reply comments by April 21, 2021, on BVES's 2021 WMP Update:

- Green Power Institute (GPI)
- Public Advocates Office at the California Public Utilities Commission (Cal Advocates)
- Rural County Representatives of California (RCRC)

On April 21, 2021, BVES submitted reply comments.

The following organizations submitted comments by June 23, 2021 on BVES's 2021 WMP Update Revision:

- Public Advocates Office at the California Public Utilities Commission (Cal Advocates)

A summary of comments incorporated into Energy Safety's disposition of BVES's WMP Update can be found in the attached Action Statement.

6. Discussion

The Commission has reviewed Energy Safety's approval of BVES's 2021 WMP Update through the Action Statement issued by Energy Safety pursuant to Pub. Util. Code Section 8386.3, based on the recommendations of the WSAB, stakeholder comments served on the R.18-10-007 service list, and other public input. The Commission ratifies Energy Safety's action approving BVES's 2021 WMP Update.

The attached Action Statement discusses in detail BVES's 2021 WMP Update and provides Energy Safety's analysis. In particular, Energy Safety focuses its analysis on progress over the past year, key areas for improvement BVES must focus on in the coming year (including ongoing reporting requirements), and additional issues where progress is needed to improve BVES's maturity over time.

6.1 Requirements of Pub. Util. Code Section 8386(c)

Below is a summary of where BVES has met each requirement pursuant to Pub. Util. Code Section 8386(c). The Commission ratifies Energy Safety's finding that BVES's 2021 WMP Update satisfies the requirements of Pub. Util. Code Section 8386(c). Discussion of how BVES has met the statutory guidelines is included in the Action Statement.

Requirement	**Requirement status in WMP Update**	**Reference to where in WMP Update requirement is met**
1. An accounting of the responsibilities of the responsible person(s) executing the plan	Met fully	Section 1
2. The objectives of the plan	Met fully	Section 5.2
3. A description of the preventive strategies and programs to be adopted by the electrical corporation to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks	Met fully	Section 7.1, 7.3
4. A description of the metrics the electrical corporation plans to use to evaluate the WMP's performance and the assumptions that underlie the use of those metrics	Met but areas for improvement identified	Section 5 and BVES's 2021 Quarterly Data Report for Q1 2021

5. A discussion of how the application of previously identified metrics to previous plan performances has informed the WMP	Met but areas for improvement identified	Section 4.1
6. Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on: critical first responders, health and communication infrastructure, customers with access and functional needs, and those with financial concerns.	Met fully	Section 8.2, Appendix A, Supporting Table 4-3
7. Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential PSPS for a given event.	Met fully	Sections 8.2, 8.4, Appendix A
8. Plans for vegetation management	Met fully	Sections 5.3, 5.4.1, 7.3.2.5
9. Plans for inspections of the electrical corporation's electrical infrastructure	Met fully	Sections 5.3, 5.4.3, 7.3.2.5
10. PSPS protocols associated with the electrical corporation’s transmission infrastructure, for	Met fully	Section 8, Appendix A

instances when the PSPS may impact customers who, or entities that, are dependent upon the infrastructure		
11. A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the electrical corporation's service territory, including all relevant wildfire risk and risk mitigation information that is part of Safety Model Assessment Proceeding (SMAP) and Risk Assessment Mitigation Phase (RAMP) filings	Met fully	Sections 4.2, 4.2.1, 4.3, 4.6
12. A description of how the WMP accounts for the wildfire risk identified in the electrical corporation's RAMP filing	Met fully	Section 4.2, 4.2.1
13. A description of the actions the electrical corporation will take to ensure its system will achieve the highest level of safety, reliability, and resiliency, and to ensure that its system is prepared for a major event, including hardening and modernizing its infrastructure with improved engineering, system design, standards, equipment, and facilities, such as undergrounding, insulating of distribution wires, and replacing poles	Met fully	Sections 5.3, 7.1, 7.3.2
14. A description of where and how the electrical corporation considered undergrounding electrical distribution lines within those areas of its service territory identified to have the highest	Met fully	Sections 5.3, 6.8.2, 7.3.2.3

wildfire risk in a commission fire threat map		
15. A showing that the electrical corporation has an adequately sized and trained workforce to promptly restore service after a major event, taking into account employees of other utilities pursuant to mutual aid agreements and employees of entities that have entered into contracts with the electrical corporation	Met fully	Section 5.4
16. Identification of any geographic area in the electrical corporation's service territory that is a higher wildfire threat than is currently identified in a Commission fire threat map, and where the Commission should consider expanding the high fire threat district based on new information or changes in the environment	Met fully	Sections 4.2, 4.2.1, 4.3
17. A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk that is consistent with the methodology used by other electrical corporations unless the Commission determines otherwise	Met fully	Section 4.2
18. A description of how the plan is consistent with the electrical corporation's disaster and emergency preparedness plan prepared pursuant to Section 768.6, including both of the following: (A) Plans to prepare for, and to restore service after, a wildfire, including workforce mobilization	Met fully	Section 7.3.2.9 and Appendices A & B

and prepositioning equipment and employees (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 United States Census data.		
19. A statement of how the electrical corporation will restore service after a wildfire.	Met fully	Section 8.2 Appendices A, B
20. Protocols for compliance with requirements adopted by the Commission regarding activities to support customers during and after a wildfire, outage reporting, support for low-income customers, billing adjustments, deposit waivers, extended payment plans, suspension of disconnection and nonpayment fees, repair processing and timing, access to utility representatives, and emergency communications	Met fully	Sections 8.4, 7.3.2.9, and Appendices A & B
21. A description of the processes and procedures the electrical corporation will use to do all of the following: (A) Monitor and audit the implementation of the plan (B) Identify any deficiencies in the plan or the plan's implementation and correct those deficiencies	Met fully	Section 7.2

(C) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, carried out under the plan and other applicable statutes and commission rules		
22. Any other information that the Wildfire Safety Division may require	Met fully	

6.2 Areas of Significant Progress

In the attached Action Statement, Energy Safety highlights areas of significant progress over the past year and areas where the electrical corporation has matured its mitigation strategies. Examples of BVES's progress are set forth below. Energy Safety evaluated BVES's progress over the past year and the Commission ratifies Energy Safety's findings that BVES's progress is sufficient to warrant approval.

- BVES has appointed a contractor to develop a series of risk maps that will show the overall ignition probability and estimated wildfire consequence along its electric lines.[11] BVES plans to complete 50% of its risk map project milestones by the end of 2021.
- BVES has improved its weather station network with installation of eight weather stations in 2020, bringing its total to 18.
- BVES completed its first and second Covered Conductor Replacement Pilot Program by replacing 2.16 circuit miles by July 31, 2020. BVES considered the pilot successful. From 2020 to 2026, BVES plans to install 4.3 miles per year for 34.5 kV lines, and 8.2 miles per year for 4 kV lines.
- BVES has contracted with a full-time utility forester to improve various aspects of its vegetation management (VM) program.
- BVES made progress in providing some of the spatial data required.

[11] BVES 2021 WMP Update Revision – Clean, p. 38

- BVES started the development of an ignition risk model, with a consultant, to assist with mitigation initiative selection and deployment at a circuit level.[12]
- BVES revised its PSPS plan on February 24, 2021, an important step forward, and attached it to the BVES 2021 WMP Update.[13] BVES indicates this plan is in response to lessons learned, and satisfies deficiencies raised by Energy Safety (including, most recently, BVES-R10).[14] The plan describes BVES's protocols for PSPS execution and addresses operational issues and coordination.

6.3 Key Areas for Improvement and Additional Issues

Energy Safety reviewed BVES's 2021 WMP Update across ten categories of mitigation initiatives, including: (1) risk assessment and mapping, (2) situational awareness and forecasting, (3) grid design and system hardening, (4) asset management and inspections, (5) vegetation management and inspections, (6) grid operations and protocols, (7) data governance, (8) resource allocation methodology, (9) emergency planning and preparedness, and (10) stakeholder cooperation and community engagement. In addition, in a change from 2020, Energy Safety evaluated the utility's progress on reducing the scale, scope, and frequency of PSPS events in a separate section in recognition that PSPS is not a preferred mitigation measure because it introduces significant risk to customers and should be used as a measure of last resort.[15]

Energy Safety identified areas for improvement for BVES over the next year (set forth below): key areas and additional issues. Key areas for improvement are areas where Energy Safety finds that an electrical corporation must focus attention to achieve the greatest reduction in utility-related wildfire risk. Additional issues are areas where Energy Safety would also like to see improvement over time.

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[12] BVES 2021 WMP Update, p. 19.

[13] BVES 2021 WMP Update Revision – Clean, Appendix A, "Bear Valley Electric Service, Inc. Public Safety Power Shutoff Plan" pp. 219-266.

[14] https://energysafety.ca.gov/wp-content/uploads/docs/misc/docket/336608441.pdf

[15] The Commission recognizes that prevailing weather conditions primarily impact the need for PSPS and has found that Pub. Util. Code sections 451 and 399.2(a) authorize the utilities to shut off power in order to protect public safety, as a measure of last resort. (Resolution ESRB-8; Phase 1 Overarching PSPS Guidelines contained in D.19-05-042.) The decision to shut off power may be reviewed by the Commission pursuant to its broad jurisdiction over public safety and utility operations. (ESRB-8.)

Energy Safety expects BVES to take action to address these key areas and report on progress made over the year in a Progress Report due by 5:00 p.m. on November 1, 2021, and in its 2022 WMP Update.[16] Energy Safety will closely monitor progress in each of these areas over the coming year.

Utility-#	Issue title	Issue description	Remedies required and alternative timeline if applicable
BVES-21-01	Inadequate disaggregation of expenditure	As discussed in Section 1.2 of the Action Statement, BVES was required to disaggregate its WMP expenditure for its Revision Notice Response. However, Cal Advocates discovered that 17 of BVES's initiatives have the same expense amount in 2020, 11 in 2021, and 13 in 2022. In response to a Cal Advocates' data request, BVES states that it spreads certain expenses equally across multiple initiatives, but BVES offers no quantitative	For its 2022 WMP Update, BVES must identify where common costs are allocated across multiple initiatives. In addition, BVES must justify its allocation methodology by describing these common costs in detail, explaining how they relate to each initiative and demonstrating that the allocated values reasonably reflect the initiatives' true costs.

[16] If key area remedies specifically cite an alternative timeline (e.g., the 2022 WMP Update), the utility is not required to submit in it November 1, 2021 Progress Report updates regarding that particular key area for improvement.

Utility-#	Issue title	Issue description	Remedies required and alternative timeline if applicable
		analysis to support such allocation.[17]	
BVES-21-02	Program targets are unmeasurable and difficult to track	The 2021 WMP guidelines defines program targets as "quantifiable measurements of activity."[18] In Table 5.3-1: List and Description of Program Targets, Last 5 Years, BVES lists 86 program targets; 32 of these targets have no numerical target and 42 targets are quantified by the unmeasurable unit "Percent Project Milestones Completed" (or similar).	In its 2022 WMP Update, BVES must: 1. Only include quantifiable measurements of activity in its list of program targets in Table 5.3-1 (or similar). 2. To the extent possible, modify existing targets to use measurable units. For example, the unit for intrusive pole inspections should be "# of Pole Inspections" rather than "Percent of Scheduled Circuits Completed."[19] 3. If using milestones as a sign of progress, describe milestones in Section 7.3 under appropriate initiatives.

[17] Comments of the Public Advocates Office on Bear Valley Electric Service's (BVES) June 3, 2021 Revision of its 2021 Wildfire Mitigation Plan Update, June 23, 2021, p. 4

[18] WSD-011 Attachment 2.2, 2021 Wildfire Mitigation Plan Guidelines Template, p. 12.

[19] BVES 2021 WMP Update Revised – Clean, pg. 61.

Utility-#	Issue title	Issue description	Remedies required and alternative timeline if applicable
BVES-21-03	Vegetation inspection roles lack minimum forestry and arboriculture qualifications	None of the roles described in Supporting Table 5.4.1-1 include minimum qualifications in forestry and arboriculture. In contrast, Liberty and PacifiCorp require their vegetation inspection personnel to either have ISA[20] Arborist Certification, be a Register Professional Forester, or have some arboriculture experience.[21] Energy Safety is concerned that BVES does not hire qualified workers to conduct vegetation inspections.	BVES must: 1. Provide evidence that its vegetation inspection personnel are adequately qualified and trained to perform vegetation inspections. 2. Include forestry and/or arboriculture certifications and/or experience as minimum qualifications for appropriate vegetation inspections roles.
BVES-21-04	No climate driven risk mapping	BVES does not have a program that addresses climate-	In its 2022 WMP Update, BVES shall describe how it applies risk analysis

[20] International Society of Arboriculture

[21] Liberty 2021 WMP Update pp. 57-58 & PacifiCorp 2021 WMP Update pp. 99-100

Utility-#	Issue title	Issue description	Remedies required and alternative timeline if applicable
		driven risk mapping.	models to consider future climate projections.
BVES-21-05	Lack of consistency in approach to wildfire risk modeling across utilities	The utilities do not have a consistent approach to wildfire risk modeling. For example, in their wildfire risk models, utilities use different types of data, use their individual data sets in different ways, and use different third-party vendors. The WSD recognizes that the utilities have differing service territory characteristics, differing data availability, and are at different stages in developing their wildfire risk models. However, the utilities face similar enough circumstances that	The utilities[22] must collaborate through a working group facilitated by Energy Safety to develop a more consistent statewide approach to wildfire risk modeling. After Energy Safety completes its evaluation of all the utilities' 2021 WMP Updates, it will provide additional detail on the specifics of this working group. A working group to address wildfire risk modeling will allow for: 1. Collaboration among the utilities; 2. Stakeholder and academic expert input; and 3. Increased transparency.

[22] Here "utilities" refers to SDG&E and Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), PacifiCorp, Bear Valley Electric Service, Inc. (BVES), and Liberty Utilities; although this may not be the case every time "utilities" is used through the document

Utility-#	Issue title	Issue description	Remedies required and alternative timeline if applicable
		there should be some level of consistency in their approaches to wildfire risk modeling statewide.	
BVES-21-06	Disparities between BVES's situational awareness and forecasting capabilities and maturity model reporting	BVES had a significant increase in its maturity assessment ratings for situational awareness and forecasting in its WMP update. The ratings are much higher in comparison to peer utilities and prior reporting in 2020. It remains unclear if the ratings selected are accurate representations of BVES's maturity, as the explanations in the initiatives do not explain these improvements.	BVES must describe: 1. How it intends to collect and measure physical impacts of weather on its grid, such as sway in lines and sway in vegetation. 2. How it plans to include wind estimations at various atmospheric altitudes relevant to ignition risk. 3. What initiative it has or how it is using ignition detection software. 4. How it plans to accurately forecast weather at least three weeks in advance.
BVES-21-07	Lack of detail on prioritization of initiatives based on determined risk	BVES does not provide any details on the actual prioritization of its grid hardening efforts, despite	BVES must: 1. Explain how the timing of deployment of its grid hardening efforts are based on its risk calculations and

Utility-#	Issue title	Issue description	Remedies required and alternative timeline if applicable
		having determined the highest risk circuits along its system. Instead, BVES relies on the Tier 2 and Tier 3 HFTD designations to justify prioritization. BVES fails to provide the details on how the timing of deployment of its grid hardening efforts mitigate its highest risk areas, and fails to provide a plan that demonstrates it is addressing and mitigating its highest risk areas.	prioritize mitigating its highest risk areas; and 2. Provide a plan that demonstrates that BVES is addressing and mitigating its self-identified highest risk areas through system hardening initiatives.
BVES-21-08	Limited evidence to support the effectiveness of covered conductor	The rationale to support the selection of covered conductor as a preferred initiative to mitigate wildfire risk lacks consistency among	The utilities[24] must coordinate to develop a consistent approach to evaluating the long- term risk reduction and cost- effectiveness of covered conductor deployment, including:

[24] Here "utilities" refers to SDG&E and Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), PacifiCorp, Bear Valley Electric Service, Inc. (BVES), and Liberty Utilities; although this may not be the case every time "utilities" is used through the document.

Utility-#	Issue title	Issue description	Remedies required and alternative timeline if applicable
		the utilities, leading some utilities to potentially expedite covered conductor deployment without first demonstrating a full understanding of its long-term risk reduction and cost-effectiveness. The utilities' current covered conductor pilot efforts are limited in scope[23] and therefore fail to provide a full basis for understanding how covered conductor will perform in the field. Additionally, utilities justify covered conductor installation by alluding to reduced PSPS risk but fail to provide adequate comparison to other initiatives' ability to reduce PSPS risk.	1. The effectiveness of covered conductor in the field in comparison to alternative initiatives. 2. How covered conductor installation compares to other initiatives in its potential to reduce PSPS risk.
BVES-21-09	Lack of asset inspection quality	BVES is in the process of adopting a formal QA/QC	BVES must:

[23] Limited in terms of mileage installed, time elapsed since initial installation, or both.

Utility-#	Issue title	Issue description	Remedies required and alternative timeline if applicable
	assurance and quality control (QA/QC) program.	program in 2021 but did not provide dates on when it intends to implement such, did not provide details on its current informal QA/QC process, nor provide details on the scope of the QA/QC program currently in development.	1. Provide a timeline for its implementation of a formal QA/QC process. 2. Explain how it conducts quality checks of its asset inspections prior to the adoption of the formal program. 3. Develop an interim QA/QC procedure for asset inspections between now and the establishment of its new QA/QC program, if such has yet to be adopted, in order to ensure that work is being completed accurately and effectively. 4. Provide updates on the development of its QA/QC program in its Progress Report, including: (i) the scope of the QA/QC program, (ii) procedures of the QA/QC program that BVES has developed, and (iii) the status of the QA/QC program implementation.

Utility-#	Issue title	Issue description	Remedies required and alternative timeline if applicable
BVES-21-10	Limited discussion of community outreach	BVES-R7 requires BVES to discuss its community engagement and outreach as it relates to VM in Section 7.3.5.1. BVES instead discusses fuels management activities performed by other entities including Big Bear Fire Department and Bear Valley Community Service District.[25] BVES mentions outreach efforts to "USFS, CAL FIRE and Big Bear Fire Department in an effort to develop collaborative measures in the area of fuels management," but fails to discuss how it mitigates the community impacts of major VM activities including tree-trimming and tree removal.	BVES must: 1. Provide descriptions of notification and communication methods for customers and partner agencies regarding VM activities including, but not limited to, tree-trimming and tree removal. 2. Detail any efforts in community outreach and public education related to vegetation management.

[25] BVES 2021 WMP Update Revision – Clean, p. 149.

Utility-#	Issue title	Issue description	Remedies required and alternative timeline if applicable
BVES-21-11	Inadequate discussion of QA/QC of VM inspections	From the discussion in Section 7.3.5.13, it is difficult to know whether BVES has a QA/QC program for VM. A brief mention of third-party evaluations is the only unequivocal detail. It is unclear whom at BVES performs QA/QC, how often QA/QC is performed, and what goals and targets exist for QA/QC.	BVES must: 1. Describe the "lessons learned from third party evaluations and inspections."[26] 2. Provide the number of QA/QC evaluation and inspections completed each year. 3. Provide a QA/QC audit target as a percentage of total VM inspections per year. 4. Detail BVES's differentiation between its quality assurance program and quality control program. 5. Report on BVES's plan to add a QA program to the current QC program.[27]
BVES-21-12	Spatial data issues	Energy Safety has identified numerous areas for improvement for BVES's Quarterly Data Reports. These issues negatively affect the usability	See Table 3 for specific remedies related to each data issue. In the November 1, 2021 report, BVES must report on its progress in advancing its GIS capabilities.

[26] BVES 2021 WMP Update Revision – Clean, p. 159.

[27] BVES 2021 WMP Update Revision – Clean, p. 159.

Utility-#	Issue title	Issue description	Remedies required and alternative timeline if applicable
		of the data and do not meet Energy Safety GIS Standard. Energy Safety has specified these issues in Table 3 of the Action Statement.	
BVES-21-13	Unexplained changes to risk spend efficiency (RSE) estimates for wildfire and PSPS mitigation initiatives	In its 2021 Revised WMP Update, BVES reported six different RSE estimates for wildfire mitigation initiatives and four different RSE estimates for PSPS mitigation initiatives compared to its 2020 WMP without explanation. Refer to Table 4 and Table 5 for specific initiatives and RSE estimates.	BVES must provide all supporting documents and workpapers to justify the changes in RSE estimates outlined in Table 4 and Table 5 of the Action Statement.
BVES-21-14	Limited discussion on reduction of scale, scope, and frequency of PSPS	BVES has limited discussion on its near-term progress for reduction in scale, scope, and frequency of PSPS. BVES stated that due to its minimal	BVES must report on its plan to minimize the scale, scope, and frequency of PSPS events normalized for weather events and climatic conditions, and fully describe how its planned

Utility-#	Issue title	Issue description	Remedies required and alternative timeline if applicable
		use of PSPS in the past, it is unable to further reduce PSPS. Nevertheless, BVES must still report its plans to minimize PSPS scale, scope, and frequency, normalized for weather events and climatic conditions.	mitigation initiatives minimize PSPS impact.

6.4 Wildfire Mitigation Costs

Pursuant to statute, an electrical corporation's costs associated with wildfire mitigation activities are not approved as part of its WMP; rather, costs are evaluated in each electrical corporation's General Rate Case or other application for rate recovery.

In BVES's 2021 WMP Update, actual 2020 mitigation costs were higher than projected costs for 2020 (the 2020 projected costs were approximately $14.4 million; 2020 actual costs were $18.8 million), a 30.8% increase. Over the entire three-year mitigation cycle, 2020-2022, BVES's wildfire mitigation costs are projected to be $57 million.

Energy Safety reviewed these projected wildfire mitigation cost increases and made the following observations:

1. The difference as projected in its 2021 WMP Update compared to 2020 WMP projections relates to costs from more investment in grid design and system hardening (an increase of $44.6% from $10,764,151 to $15,565,438), data governance ($0 to $114,466), resource allocation ($0 to $27,258), stakeholder cooperation and

community engagement ($0 to $24,027), and risk assessment and mapping ($0 to $18,172).

2. BVES reports notable expenditure decreases from its 2020 planned expenditure in situational awareness and forecasting (80.9% decrease, $337,000 to $64,217) and emergency planning (64.3% decrease, $200,000 to $71,363).

The Commission will evaluate wildfire mitigation costs in BVES's General Rate Case or appropriate application.

7. Maturity Evaluation

In 2020, WSD introduced a new Utility Wildfire Mitigation Maturity Model (the Maturity Model) to establish a baseline understanding of an electrical corporation's current and projected capabilities and assess whether each electrical corporation is progressing sufficiently to improve its ability to mitigate wildfire risk effectively. The Maturity Model also serves as an objective means of comparing measurements of progress across electrical corporations and provides a framework for driving progress in wildfire risk mitigation over time. To identify an electrical corporation's progress within the Maturity Model, the WSD required each electrical corporation to complete a survey in which it answered questions addressing its maturity regarding 52 wildfire mitigation-related capabilities at the time of submission and its projections of its maturity at the end of the three-year plan horizon. The 52 capabilities are mapped to the same ten categories identified for mitigation initiatives.

The Maturity Model will continue to evolve over time to reflect best practices and lessons learned. In 2021 the maturity model was updated to clarify definitions while remaining consistent with the 2020 model to enable year-over-year progress tracking. It is essential that the maturity levels are understood within the context of the qualitative detail supporting each level. The model results require context and should not be interpreted as the final word on an electrical corporation's wildfire mitigation capabilities without an understanding of the scoring process described in Action Statement Appendix 11.1. As such, the final Maturity Model outputs should be viewed as levels or thresholds—they are not absolute scores.

The Commission ratifies the Energy Safety's findings that BVES has made sufficient progress toward maturity in the past year. The Commission and

Energy Safety expect BVES to continue to improve its maturity in all areas in order to reduce utility-related wildfire risk.

Summary of BVES Maturity Evaluation

- BVES plans to increase its maturity across all mitigation initiative categories for the 3-year WMP cycle, placing its maturity above or equal to that of Liberty Utilities and PacifiCorp in all categories except for Risk Assessment and Mapping.
- The largest maturity increase is planned to occur in Data Governance; BVES started 2020 with a maturity score of 0.5 and plans to end 2023 with a maturity of 3.25. BVES's end score of 3.25 is higher than all other electric corporations except San Diego Gas & Electric Company (SDG&E).
- Between 2020 and 2021, BVES had maturity growth in only 2 categories: Situational Awareness and Grid Operations & Protocols (other categories decreased maturity or remained flat).
- BVES reports significant decreases in 2020 planned vs actual expenditure for Situational Awareness and Forecasting (-81%) and Emergency Planning and Preparedness (-65%) despite planned increases to maturity in both categories.

BVES's maturity evaluation is further detailed in the attached Action Statement (see Action Statement Appendix 11.1 for a summary of BVES's 2021 Maturity Survey output).

8. Next Steps

In its Action Statement, Energy Safety sets forth the next steps BVES must take following Energy Safety's approval of its 2021 WMP Update. This includes a process for significantly modifying (i.e., reducing, increasing, or ending) mitigation measures in the WMP.

Upon ratification of this resolution, Energy Safety discontinues the ongoing Quarterly Report established in the 2020 WMP, except for the Quarterly Data Reports pursuant to Guidance-10 from Resolution WSD-002.

Upon ratification of this resolution, BVES is required to provide a Progress Report by 5:00 p.m. on November 1, 2021, including the following:

1. Progress on remedies associated with key areas for improvement listed in section 6.3 of this Resolution and section 1.3 of the attached Action Statement. Further details on remedies can be found in the Action Statement.
2. Additional requirements explicitly set by Energy Safety, including additional items that require ongoing progress updates, pursuant to future guidance.

Energy Safety may change reporting requirements and processes through its own public notice process.The Commission expects the electrical corporation to adhere to all ongoing requirements set forth in the Action Statement.

9. Consultation with CAL FIRE

Pub. Util. Code Section 8386.3(a) requires Energy Safety to consult with CAL FIRE in reviewing electrical corporations' 2021 WMP Updates. The Commission and CAL FIRE have a memorandum of understanding in place to facilitate this consultation (Pub. Util. Code Section 8386.5). The Commission and Energy Safety have met these requirements, but this Resolution does not purport to speak for CAL FIRE.

10. Office of Energy Infrastructure Safety

Pursuant to Public Utilities Code Section 326(b), on July 1, 2021, the Wildfire Safety Division (WSD) transitioned from the Commission into the Office of Energy Infrastructure Safety (Energy Safety) under the California Natural Resources Agency. Energy Safety "is the successor to" and "is vested with all of the duties, powers, and responsibilities of the Wildfire Safety Division,"[28] including, but not limited to, jurisdiction for evaluating and approving or denying electrical corporations' WMPs and evaluating compliance with regulations related to the WMPs. The Commission and the newly formed Energy Safety will adhere to all statutory requirements pertaining to the WMP process.

WSD is used to describe the work of the WSD prior to July 1, 2021. Energy Safety is used to describe the work of Energy Safety beginning on July 1, 2021. Any

[28] Government Code Section 15475.

references to WSD action post July 1, 2021 or to Energy Safety action prior to July 1, 2021 are inadvertent and should be interpreted as the actions of WSD or Energy Safety as appropriate.

11. Impact of COVID-19 Pandemic

On March 19, 2020, 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).[29]

As articulated in the March 27, 2020, joint letters[30] 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.

Since issuance of this letter, the WSD has expected 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.

[29] Executive Order N-33-20, see https://www.gov.ca.gov/wp-content/uploads/2020/03/3.19.20-attested-EO-N-33-20-COVID-19-HEALTH-ORDER.pdf.

[30] Letters to each electrical corporation are found at https://web.archive.org/web/20210520045535/https://www.cpuc.ca.gov/covid/under the heading "Other CPUC Actions," March 27, 2020: Joint Letters to IOUs re: Essential Wildfire and PSPS Mitigation Work (as of July 14, 2021, this webpage is no longer active on the CPUC website).

Throughout 2021, Energy Safety expects the electrical corporations to continue to make meaningful progress on wildfire mitigation goals and efforts to reduce the scale, scope, and frequency of PSPS events while continuing to abide by COVID-19 public health guidelines.

12. Conclusion

- BVES's 2021 Wildfire Mitigation Plan Update contains all of the elements required by AB 1054, Pub. Util. Code Section 8386(c) and all elements required by the WMP Guidelines.
- The Commission ratifies the Energy Safety's Action Statement approving BVES's 2021 WMP Update subject to any requirements contained therein.

13. Comments

Pub. Util. Code Section 311(g)(1) provides that resolutions must be served to 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 party status in R.18-10-007 in order to submit comments.

On August 6, 2021, this draft Resolution was served on the service list of R.18-10-007 and posted on the Commission's website, https://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=397282245. Comments were due on August 26, 2021, 20 days from the mailing of the draft of this Resolution. Reply comments were not accepted.

On August 26, 2021, Cal Advocates timely submitted comments on the draft BVES Resolution and Action Statement. In its comments Cal Advocates supports the draft Action Statement and agrees with several specified remedies proposed by Energy Safety.

Findings

1. AB 1054 and Commission Resolution WSD-001 require BVES to submit a WMP Update for 2022 that conforms with Pub. Util. Code Section 8386(c) and guidance adopted in Resolution WSD-011.
2. The 2021 WMP Update was reviewed and acted upon with due consideration given to comments received from governmental agencies (including CAL FIRE), the WSAB, members of the public, and all other relevant stakeholders.

3. The 2021 WMP Update was reviewed and acted upon in compliance with all relevant requirements of state law.
4. BVES's 2021 WMP Update contains all the elements required by Pub. Util. Code Section 8386(c) and BVES has satisfied the requirements of Pub. Util. Code Section 8386(c) and the 2021 WMP Guidelines.

THEREFORE, IT IS ORDERED THAT:

1. Energy Safety's Action Statement approving Bear Valley Electric Service, Inc.'s 2021 Wildfire Mitigation Plan Update is ratified.
2. Bear Valley Electric Service, Inc. shall meet all commitments in its 2021 WMP Update.
3. Bear Valley Electric Service, Inc. shall provide a Progress Report to the Commission and the Office of Energy Infrastructure Safety by 5:00 p.m. November 1, 2021, or as otherwise directed by the Office of Energy Infrastructure Safety.
4. Bear Valley Electric Service, Inc. shall submit any reports previously required to be submitted to Wildfire Safety Division, including Quarterly Data Reports, to the Office of Energy Infrastructure Safety according to forthcoming guidance.
5. Bear Valley Electric Service, Inc. shall submit an update to its Wildfire Mitigation Plan in 2022 according to the forthcoming guidance and schedule issued by the Office of Energy Infrastructure Safety.
6. Bear Valley Electric Service, Inc. shall submit a new comprehensive three-year Wildfire Mitigation Plan in 2023, or as otherwise directed by Office of Energy Infrastructure Safety.
7. Bear Valley Electric Service, Inc. must adhere to all requirements set forth in Energy Safety's Action Statement.
8. 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.
9. In accordance with Public Utilities Code Section 8386.4, Bear Valley Electric Service, Inc. may track the costs associated with its Wildfire Mitigation Plan in a memorandum account by category of costs and shall be prepared for Commission review and audit of the accounts at any time.

10. 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 September 9, 2021; the following Commissioners voting favorably thereon:

/s/ RACHEL PETERSON

Rachel Peterson
Executive Director

MARYBEL BATJER
President
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
DARCIE L. HOUCK
Commissioners

APPENDIX A
Action Statement

(see attached)

APPENDIX B
Public Utilities Code Section 8386

Public Utilities Code Section 8386
From Public Utilities Code (PUC) Division 4.1. Provisions Applicable to Privately Owned and Publicly Owned Public Utilities [8301 - 8390].

Chapter 6. Wildfire Mitigation [8385 - 8389]

8386.

(a) Each electrical corporation shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment.

(b) Each electrical corporation shall annually prepare and submit a wildfire mitigation plan to the Wildfire Safety Division for review and approval. In calendar year 2020, and thereafter, the plan shall cover at least a three-year period. The division shall establish a schedule for the submission of subsequent comprehensive wildfire mitigation plans, which may allow for the staggering of compliance periods for each electrical corporation. In its discretion, the division may allow the annual submissions to be updates to the last approved comprehensive wildfire mitigation plan; provided, that each electrical corporation shall submit a comprehensive wildfire mitigation plan at least once every three years.

(c) The wildfire mitigation plan shall include all of the following:

(1) An accounting of the responsibilities of persons responsible for executing the plan.

(2) The objectives of the plan.

(3) A description of the preventive strategies and programs to be adopted by the electrical corporation to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.

(4) A description of the metrics the electrical corporation plans to use to evaluate the plan's performance and the assumptions that underlie the use of those metrics.

(5) A discussion of how the application of previously identified metrics to previous plan performances has informed the plan.

(6) Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety. As part of these protocols, each electrical corporation shall include protocols related to mitigating the public safety impacts of disabling reclosers and deenergizing portions of the electrical distribution system that consider the impacts on all of the following:

(A) Critical first responders.

(B) Health and communication infrastructure.

(C) Customers who receive medical baseline allowances pursuant to subdivision (c) of Section 739. The electrical corporation may deploy backup electrical resources or provide financial assistance for backup electrical resources to a customer receiving a medical baseline allowance for a customer who meets all of the following requirements:

(i) The customer relies on life-support equipment that operates on electricity to sustain life.

(ii) The customer demonstrates financial need, including through enrollment in the California Alternate Rates for Energy program created pursuant to Section 739.1.

(iii) The customer is not eligible for backup electrical resources provided through medical services, medical insurance, or community resources.

(D) Subparagraph (C) shall not be construed as preventing an electrical corporation from deploying backup electrical resources or providing financial assistance for backup electrical resources under any other authority.

(7) Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines, including procedures for those

customers receiving medical baseline allowances as described in paragraph (6). The procedures shall direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential deenergization for a given event.

(8) Plans for vegetation management.

(9) Plans for inspections of the electrical corporation's electrical infrastructure.

(10) Protocols for the deenergization of the electrical corporation's transmission infrastructure, for instances when the deenergization may impact customers who, or entities that, are dependent upon the infrastructure.

(11) A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the electrical corporation's service territory, including all relevant wildfire risk and risk mitigation information that is part of the commission's Safety Model Assessment Proceeding (A.15-05-002, et al.) and the Risk Assessment Mitigation Phase filings. The list shall include, but not be limited to, both of the following:

(A) Risks and risk drivers associated with design, construction, operations, and maintenance of the electrical corporation's equipment and facilities.

(B) Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the electrical corporation's service territory.

(12) A description of how the plan accounts for the wildfire risk identified in the electrical corporation's Risk Assessment Mitigation Phase filing.

(13) A description of the actions the electrical corporation will take to ensure its system will achieve the highest level of safety, reliability, and resiliency, and to ensure that its system is prepared for a major event, including hardening and modernizing its infrastructure with improved engineering, system design, standards, equipment, and facilities, such as undergrounding, insulating of distribution wires, and replacing poles.

(14) A description of where and how the electrical corporation considered undergrounding electrical distribution lines within those areas of its service

territory identified to have the highest wildfire risk in a commission fire threat map.

(15) A showing that the electrical corporation has an adequately sized and trained workforce to promptly restore service after a major event, taking into account employees of other utilities pursuant to mutual aid agreements and employees of entities that have entered into contracts with the electrical corporation.

(16) Identification of any geographic area in the electrical corporation's service territory that is a higher wildfire threat than is currently identified in a commission fire threat map, and where the commission should consider expanding the high fire threat district based on new information or changes in the environment.

(17) A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk that is consistent with the methodology used by other electrical corporations unless the commission determines otherwise.

(18) A description of how the plan is consistent with the electrical corporation's disaster and emergency preparedness plan prepared pursuant to Section 768.6, including both of the following:

(A) Plans to prepare for, and to restore service after, a wildfire, including workforce mobilization and prepositioning equipment and employees.

(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 United States Census data.

(19) A statement of how the electrical corporation will restore service after a wildfire.

(20) Protocols for compliance with requirements adopted by the commission regarding activities to support customers during and after a wildfire, outage reporting, support for low-income customers, billing adjustments, deposit waivers, extended payment plans, suspension of disconnection and nonpayment fees, repair processing and timing, access to electrical corporation representatives, and emergency communications.

(21) A description of the processes and procedures the electrical corporation will use to do all of the following:

(A) Monitor and audit the implementation of the plan.

(B) Identify any deficiencies in the plan or the plan's implementation and correct those deficiencies.

(C) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, carried out under the plan and other applicable statutes and commission rules.

(22) Any other information that the Wildfire Safety Division may require.

(d) The Wildfire Safety Division shall post all wildfire mitigation plans and annual updates on the commission's internet website for no less than two months before the division's decision regarding approval of the plan. The division shall accept comments on each plan 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.

(Amended by Stats. 2020, Ch. 370, Sec. 256. [SB 1371] Effective January 1, 2021.)