

ALJ/SRT/avs

Date of Issuance 3/18/2020

Decision 20-03-004 March 12, 2020

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

Rulemaking 18-10-007

**DECISION ON COMMUNITY AWARENESS AND PUBLIC OUTREACH
BEFORE, DURING AND AFTER A WILDFIRE, AND
EXPLAINING NEXT STEPS FOR OTHER PHASE 2 ISSUES**

Liberty	133-E	Grant
PacifiCorp	596-E	Deny without prejudice

7. Bear Valley may only de-energize the line it identifies as the “Radford Line” if such de-energization complies with the Commission’s existing de-energization rules, as set forth in Resolution ESRB-8 and R.18-12-005.

8. The Commission’s process for determining effectiveness of a wildfire mitigation measure is separate from the Off-Ramp Advice Letter process.

9. Public safety requires that outreach reaches the intended audience.

10. Public safety requires that the IOUs and SMJUs survey the communities where they conduct outreach and use other metrics to determine that they are using effective methods.

11. The Commission issues expanded outreach requirements pursuant to its obligation to assure Californians’ access to safe and reliable utility infrastructure and services.

O R D E R

IT IS ORDERED that:

1. No later than May 15, 2020, each Investor Owned Utility (IOU) and Small and Multi-Jurisdictional Utility (SMJU) shall demonstrate to the Commission’s satisfaction that it conducts community awareness and public outreach before, during, and after a wildfire in any language that is “prevalent” in its service territory or portions thereof. A language is “prevalent” if it is spoken by 1,000 or more people in the affected IOU’s or SMJU’s service territory. Such languages shall include languages spoken by indigenous communities, such as Mixteco and Zapoteco, spoken by indigenous people that occupy significant roles in California’s agricultural economy regardless of prevalence. An IOU or SMJU

23. The Tier 3 Off-Ramp Advice Letters filed by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), Bear Valley Electric Service (Bear Valley), Liberty Utilities (Liberty), and PacifiCorp,) in accordance with Decision 19-05-036 are granted or denied as set forth in the following table.

Utility	AL	Grant or Deny?
PG&E	5703-E	Grant with limitations. This decision takes no action on PG&E's timelines.
SCE	4120-E	Deny "Battery Backup Incentive Program" portion without prejudice
SDG&E	3472-E	Grant
Bear Valley	374-E	Grant with conditions. Bear Valley must comply with the Commission's existing de-energization rules as set forth in Resolution ESRB-8 and Rulemaking 18-12-005.
Liberty	133-E	Grant
PacifiCorp	596-E	Deny without prejudice

The foregoing Advice Letters and protests to them are incorporated into the record of this decision and the ex parte rules related to ratesetting proceedings apply to them.

24. This decision makes no determination on the effectiveness of wildfire mitigation measures addressed or proposed in the Advice Letters filed by Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp.

25. Nothing in this decision is intended to change any state or local emergency requirements, rules, protocols or agreements on the content of utility communications during a wildfire.



ADVICE LETTER SUMMARY



ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Bear Valley Electric Service (913-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Nguyen Quan
 Phone #: (909) 394-3600 x664
 E-mail: nquan@gswater.com
 E-mail Disposition Notice to: nquan@gswater.com

EXPLANATION OF UTILITY TYPE
 ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 374-E

Tier Designation: 3

Subject of AL: Reports on Possible Off Ramps

Keywords (choose from CPUC listing): Compliance, Report

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision No. 19-05-036

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 12/1/19

No. of tariff sheets: 0

Estimated system annual revenue effect (%): 0.0

Estimated system average rate effect (%): 0.0

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed¹: See Advice Letter

Pending advice letters that revise the same tariff sheets: None

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

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San Francisco, CA 94102
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November 20, 2019

Advice Letter No. 374-E

(913 E)

California Public Utilities Commission

Attention: Energy Division
Advice Letter Filings Room 4005

Golden State Water Company (“GSWC”) hereby transmits for filing an original and two conformed copies of the following tariff sheets applicable to its Bear Valley Electric Service (“BVES”) district:

SUBJECT: *Reports on Possible Off Ramps*

PURPOSE

In Decision No. (“D.”) 19-05-040, the California Public Utilities Commission (“Commission”) authorized BVES to, among other things, implement a system hardening program to replace bare conductor wire with covered conductor. The purpose of this filing is to inform the Commission and the Safety & Enforcement Division (“SED”) that the proposed system-hardening program must be revised and will be delayed due to high bid costs.

BACKGROUND

The Radford Line Covered Conductor Replacement Project

In D.19-05-040, the Commission approves BVES’s Wildfire Mitigation Plan (“WMP”). In its WMP, BVES proposes to replace bare electric conductors with a high performance covered conductors as part of its system-hardening program. This infrastructure hardening effort included BVES’s Radford Line Covered Conductor Replacement Project (hereafter “Radford Line” or “Radford”). BVES proposes the strengthening of the Radford Line for the following reasons:

- i. The Radford Line is mostly located in the High Fire Threat District (“HFTD”) Tier 3 area, and more specifically, it poses the highest risk to wildfires of all of BVES’s overhead facilities;
- ii. Since the bare wire of the Radford Line must be replaced with the heavier covered wire, 63 poles on the Line will need to be replaced due to loading considerations;

- iii. The Radford Line is mostly located in a densely vegetated area and very steep terrain that is difficult to patrol with few service roads or trails that trucks can traverse. Therefore, the 63 poles would require the use of a helicopter for installation and removal. In addition, most of the pole holes would need to be hand dug down to about 7.5 feet or more.

Together, these noted factors drive up the cost of the project. BVES is keenly aware of the expenses of upgrading the Radford Line and the timeframe within which BVES must execute the WMP. BVES estimated that the costs to replace bare wire with a high performance covered conductor on the Radford Line to be \$2,500,000 (WMP at page 23). BVES is also cognizant of the potential delay in starting the project, which could be deferred until the spring of 2020 (WMP at page 23).

Project Bids and Plan

BVES issued a request for proposal (“RFP”) for contractors to design and construct the Radford Line project and received three bids. All three bids were significantly higher than BVES’s estimated cost for the Radford Line project. The cost variance between BVES and the three bidders ranges from \$1,348,000 to \$4,427,000 higher. As a result, BVES requested new bids with a scope of work for the design only. The intent was to develop construction drawings so that contractors could then bid again on the construction part of the job knowing the full design specifications. This would remove risks typically inherent in design-build projects and allow contractors to remove contingencies from their pricing. This additional bidding process inserted delays in the project schedule. The design project was ultimately awarded in September 2019 and will be completed by January 2020. The next step will be to bid out the construction portion of the project in January 2020 and construction will likely commence in May 2020, after the winter season is over, which normally halts construction activities.

BVES Risk Mitigation Plan

Pending completion of the Radford Line project, BVES implemented a plan to mitigate wildfire risks, which include the following:

1. De-energize the Radford Line from April 1 to October 31 (this does not impact BVES’s ability to meet load demand since loads are lower during this period);
2. Install a new recloser switch (S&C IntelliRupter | PulseConditioner) on the Radford Line (this recloser tests at significantly reduced power when operating in automatic mode; thereby, sending about 5-10% of energy to determine if the fault cleared);
3. Implement a policy to place the recloser in “manual” when weather conditions increase the risk of wildfires such as “very dry” conditions per National Fire

Danger Rating System (NFDRS). In this mode, if the recloser opens, a complete patrol of the line is required before the recloser may be shut to test and return to service;

4. Prior to energizing the Radford Line in November, BVES conducted vegetation clearance on the Radford Line as needed to meet clearance specifications and conducts a comprehensive foot patrol of the entire line.
5. While BVES typically operates the Radford Line from about November 1 through March 31 each year, the line would be de-energized when extreme fire weather and threat conditions occur as part of BVES's public safety power shutdown procedures. To date, such action has not been required.

COMPLIANCE

In D.19-05-036, Ordering Paragraph No. 1 states the following:

1. All electrical corporations named as respondents shall file two Tier 3 Advice Letters entitled "Reports on Possible Off Ramps," describing any concerns about the effectiveness of any program in their individual Wildfire Mitigation Plans. The first Advice Letter shall be filed and served on the service list for this proceeding no later than 6 months from the effective date of this decision and the second Advice Letter shall be filed and served no later than 12 months after the effective date of this decision. Each report shall clearly describe the concern, contain a specific proposal for action, including if applicable a recommendation to reduce or end the specific mitigation identified, and include any expert or other authoritative information available on the efficacy of the mitigation.

The filing of this Advice Letter is timely and BVES is in compliance with Commission D.19-05-036. In April 2020, BVES will file the second Advice Letter to apprise the Commission and the SED on the status of the Radford Line Covered Conductor Replacement Project.

Lastly, BVES is serving a copy of this advice letter on all persons listed on the service for R. 18-10-007.

EFFECTIVE DATE

GSWC respectfully requests approval of this Advice Letter allowing these forms to become applicable and effective on December 1, 2019

TIER DESIGNATION

This advice letter is submitted with a Tier 3 designation.

NOTICE AND PROTESTS

No individuals or utilities have requested notification of filing of tariffs. In accordance with General Order 96-B, a copy of this advice letter is being furnished to the entities listed on the attached service list by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed.

A protest is a document objecting to the granting in whole or in part of the authority sought in this advice letter.

A response is a document that does not object to the authority sought, but nevertheless presents information that the party tendering the response believes would be useful to the CPUC in acting on the request.

A protest must be mailed within 20 days of the date the CPUC accepts the advice letter for filing. The Calendar is available on the CPUC's website at www.cpuc.ca.gov.

A protest must state the facts constituting the grounds for the protest, the effect that approval of the advice letter might have on the protestant, and the reasons the protestant believes the advice letter, or a part of it, is not justified. If the protest requests an evidentiary hearing, the protest must state the facts the protestant would present at an evidentiary hearing to support its request for whole or partial denial of the advice letter. The utility must respond to a protest with five days.

All protests and responses should be sent to:

California Public Utilities Commission, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

A copy of the protest should also be sent via e-mail to the attention of the ED Tariff Unit (EDTariffUnit@cpuc.ca.gov) ATTN: Tariff Unit

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

Copies of any such protests should be sent to this utility at:

Golden State Water Company
ATTN: Nguyen Quan
630 East Foothill Blvd.
San Dimas, CA 91773

Fax: (909) 394-7427

E-mail: nquan@gswater.com

If you have not received a reply to your protest within 10 business days, contact Ronald Moore at (909) 394-3600 ext. 682.

In accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the advice letter filing open for public inspection at Bear Valley Electric Service and Golden State Water Company Headquarters.

Sincerely yours,

/s/ Nguyen Quan

Nguyen Quan

Manager, Regulatory Affairs

c: Edward Randolph, Director, Energy Division
Franz Zeng, Energy Division
R. Mark Pocta, Office of Ratepayer Advocates
Elizaveta Malashenko, Safety & Enforcement Division
Bear Valley Electric G.O. 96-B Service List

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: R1810007 - CPUC - OIR TO IMPLEM

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