DATA REQUEST RESPONSE
Bear Valley Electric Service
BVES R.18-10-007

Response provided by:	Paul Marconi
Title:	Director, Bear Valley Electric Service
Data Request Number:	Data Request SEDWMP-1
Data Request Originator:	Wildfire Mitigation Plan Team (WMPSED@cpuc.ca.gov)
Date Received:	March 14, 2019
Date Due:	March 19, 2019
Date Provided:	March 19, 2019

Data Request received via email from Wildfire Mitigation Plan Team (WMPSED@cpuc.ca.gov) on March 14, 2019. This data request was sent to BVES without a title number. BVES has numbered this data request "SEDWMP-1":

Reference – Bear Valley Wildfire Mitigation Plan 4.1.1.2 Under-grounding the Ute Lines (pg 20):

1. **Provide the status of ownership of the Ute Lines.**

   Response:
   The Ute Lines (1 & 2) are Southern California Edison (SCE) assets.

2. **Has or is Bear Valley BV sought approval for the asset transfer and/or undergrounding project funding through any another CPUC proceeding?**

   Response:
   No. At the time of BVES filed its most recent General Rate Case (A.17-05-004) on May 1, 2017, this proposed project had not been developed. BVES is seeking approval for this project as part of its Wildfire Mitigation Plan filed on February 6, 2019 in accordance with R.18-10-007 and SB-901.

3. **Provide analysis wherein BV determined that undergrounding of the Ute Lines was the most appropriate option in order to mitigate catastrophic wildfire likelihood or catastrophic wildfire impact.**

   Response:
   BVES service area is completely surrounded by SCE territory. BVES loads are served by 2 main sub-transmission lines that are owned and operated by SCE. These are the Ute lines and the Radford line.

   The SCE Ute Lines (1 & 2) that begin from SCE Cottonwood substation, located in Lucerne consist of approximately 1.5 miles of overhead sub-transmission bare lines (34.5 kV) that connect the BVES system at two points with the SCE Goldhill Switch Station.

The Ute Lines 1 & 2 run on the same poles for a large section of the circuit. These SCE assets are located in the U.S. Forestry Service controlled areas and also in an environmentally sensitive area known as the "pebble plain".
The Ute lines provide approximately 72% of rated supply capacity and under normal conditions 100% of BVES' loads. The Ute Lines are completely in a HFTD Tier 2 area.

The Radford line connects with SCE Harnish line at the Radford AR. The SCE Harnish line is connected to SCE Zanza Substation located in Redlands, Riverside County. The Radford line mostly traverses a HFTD Tier 3 areas, and during the summer months SCE de-energizes its Harnish line, which in turn de-energizes BVES Radford line.

The Ute lines and the Radford line allow BVES to adopt a defensive operational scheme during the fire season by allowing the de-energization of the Radford Line. Therefore, these lines are critical to BVES' energy supply and reliability and permit BVES to significantly mitigate the risk of wildfire in its HFTD Tier 3 area.

The Holcomb Fire of June 2017 damaged several SCE facilities including taking out the Ute Lines (Ute 1 and 2). Following the Holcomb Fire, BVES entered discussions with SCE on how to improve safety and reliability of the supply from Lucerne. While the lines did not cause the Holcomb Fire, it is clear the area is susceptible to wildfire (very dry vegetation and consistently high winds – HFTD Tier 2). Therefore, BVES and SCE explored the prospect of:

- BVES constructing lines equivalent to the Ute 1 & 2 along Holcomb Valley Rd, from the SCE Goldhill Switching Station (located adjacent to the Big Bear Valley waste transfer station and landfill) to the BVES 34 kV sub-transmission system on Highway 18 (North Shore Dr.).
- SCE would then remove its Ute Line assets from the U.S. Forestry area.

This project was determined to be optimal because it:

- Removes the threat of lines causing possible wildfire in the area.
- Significantly improves reliability of the main source of supply for the BVES service area by: (1) removing the single point of failure (both lines on same poles) and (2) undergrounding the lines to make them less susceptible to overhead conductor vulnerabilities to bad weather conditions, vegetation, animals, car-hit-poles, etc.
- Moves electrical assets out of the U.S. Forestry Service and environmentally sensitive areas, thus reducing the adverse impact of inspections, maintenance and repair construction work on ecologically sensitive areas.

Reference – Bear Valley Wildfire Mitigation Plan 4.3.1 Operational Considerations and Special Work Procedures (pg 28):

4. **Given that the recent trend of the Southern California wildfire season extending through the November and December timeframe, has Bear Valley considered changes to the timeframes for its defensive operational scheme?**

Response:
The timeframes described in BVES' Wildfire Mitigation Plan for its defensive operational scheme are the normal target dates but the ultimate decision to change the operational scheme rests with the Operations & Planning Manager. The Manager also ascertains the actual weather conditions and forecasts, as well as the fuel inventory in the service area before directing any changes in the operational scheme. As additional data are collected, BVES will re-evaluate the target dates in each future annual Wildfire Mitigation Plan it files with the Commission.

5. **Under what circumstances would Bear Valley consider such changes?**

Response:
BVES ascertain t the degree of dryness of the service area, the amount of fuel inventory as well as the long-term forecasts (storm patterns, projected Santa Ana winds, etc.). It should be noted, that if BVES were to shift out of its defensive operational scheme, it would only take a few hours to shift back into it. In BVES' Wildfire Mitigation Plan Section 4.3.1, the following guidance is provided:

*"**Execution:** As stated previously, BVES monitors the NFDRS fire danger forecast each day and then determines the proper operational focus from reliability to fire prevention. Exact steps depend on the level of fire threat. As indicated in Table 4 4 below, "Brown", "Red", and "Orange" are considered elevated fire threat conditions that require the BVES system to be configured for fire prevention over reliability concerns."*

If BVES were to shift out of its optimized defensive operational scheme and conditions favorable to wildfire were to suddenly develop, BVES would shift to its defensive operational scheme prioritizing fire prevention over reliability.

Reference – Bear Valley Wildfire Mitigation Plan Evaluation of Higher Fire Threat Areas (pg 16)

6. **Provide an outline of the specific mitigations that will be deployed in five (5) high risk localities identified by Bear Valley or describe how those localities will be prioritized during the rollout of their general mitigation activities.**

Response:
The five high risk localities are targeted to be the "first-in-line" for all of the BVES Wildfire Mitigation measures including: elimination of conventional fuses, covered wire projects, pole loading and assessment program, tree attachment removal project, inspections, vegetation management efforts, etc. It is BVES' goal to eventually not have any "high risk localities".