

DATA REQUEST RESPONSE
Bear Valley Electric Service, Inc.
Wildfire Mitigation Plan

Response provided by: Paul Marconi
Title: President, Treasurer and Secretary
Data Request Number: CalAdvocates-BVES-2021WMP-05
Date Received: June 14, 2021
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From Aaron Louie (Public Advocates Office) email to BVES dated June 14, 2021. The following questions relate to BVES’s Revised 2021 WMP submitted on June 3, 2021, and reference Cal Advocates’ Excel file provided as an attachment to this data request -- “BVES_2020_Q4_Table12_Revision_20210603_Cal_Advocates_Analysis, Tab 2: Pivot Table” (“Attachment”). This Excel file uses data provided in Table 12 of the BVES’s Revised 2021 WMP.

1. **BVES’s Revised Table 12 contains a number of initiatives that share the same dollar amount for 2020 actual expenditures. For example, 17 separate wildfire mitigation initiatives have the same balance of \$9,086 reported for the 2020 Actual Operating Expenditures (see Attachment, Column D, Cells 45-61)”**
 - a. **For each group of initiatives that share the same dollar amount for 2020 actual expenditures, as described above,**
 - i. **Explain why the initiatives have the exact same dollar amount.**
 - ii. **Explain why BVES’s expenditure recording methodology for this group of initiatives is reasonable.**
 - b. **For 2021 and 2022 actual expenditure reporting in future WMPs, does BVES expect to have multiple initiatives with the same dollar amount, similar to what is described above?**
 - c. **If the answer to b) above is yes, please explain and reconcile BVES’s response with its statement regarding disaggregation of expenditures as noted below by the WSD in its May 4, 2021 Revision Notice:**

On July 13, 2020, BVES sent the WSD a letter in accordance with Ordering Paragraph 11 of Resolution WSD-002, in which it stated that, “BVES does not have any wildfire mitigation measures in its Wildfire Mitigation Plan that cannot be disaggregated.” (footnote excluded)

Response:

1.a.(i. & ii.). In Wildfire Safety Division's Revision Notice for Bear Valley Electric Service, Inc.'s 2021 Wildfire Mitigation Plan Update of May 4, 2021, it is stated that BVES shall submit a revised Table 12 in which expenditures are reported for each individual initiative identified in its 2021 WMP Update. Since BVES had aggregated many initiatives into single initiatives, the costs of many initiatives in its original WMP submission were also aggregated. BVES has since developed a methodology to disaggregate the initiatives and their respective costs to better align with WMP Guidelines.

The following initiatives in 2020 had the same expenditure value of \$9,086, which was based on the initiative being primarily a management/supervisory level of effort valued at 2% of combined management/supervisory time devoted to the initiative (these expenditures are already in rates and are not considered incremental; therefore, BVES will not seek recovery of these particular expenditures in its WMP memorandum account):

- 7.3.4 Asset management and inspections (4.3. Improvement of inspections)
- 7.3.4 Asset management and inspections (4.14. Quality assurance / quality control of inspections)
- 7.3.5 Vegetation management and inspections (5.6. Improvement of inspections)
- 7.3.5 Vegetation management and inspections (5.13. Quality assurance / quality control of inspections)
- 7.3.5 Vegetation management and inspections (5.14. Recruiting and training of vegetation management personnel)
- 7.3.6 Grid operations and protocols (6.1. Automatic recloser operations)
- 7.3.6 Grid operations and protocols (6.3. Personnel work procedures and training in conditions of elevated fire risk)
- 7.3.6 Grid operations and protocols (6.4. Protocols for PSPS re-energization)
- 7.3.6 Grid operations and protocols (6.5. PPS events and mitigation of PPS impacts)
- 7.3.7 Data governance (7.3. Documentation and disclosure of wildfire-related data and algorithms)
- 7.3.7 Data governance (7.4. Tracking and analysis of risk event data)
- 7.3.8 Resource allocation methodology (8.1. Allocation methodology development and application)
- 7.3.8 Resource allocation methodology 8.2. Risk reduction scenario development and analysis
- 7.3.8 Resource allocation methodology 8.3. Risk spend efficiency analysis – not to include PPS
- 7.3.9 Emergency planning and preparedness (9.1. Adequate and trained workforce for service restoration)
- 7.3.9 Emergency planning and preparedness (9.4. Disaster and emergency preparedness plan)

- 7.3.9 Emergency planning and preparedness (9.5. Preparedness and planning for service restoration)
- 7.3.9 Emergency planning and preparedness (9.6. Protocols in place to learn from wildfire events)
- 7.3.10 Stakeholder cooperation and community engagement (10.3. Cooperation with suppression agencies)

The following initiatives in 2020 had the same expenditure value of \$11,000. These expenditures are related to BVES's weather consulting contract in 2020. BVES's weather consulting services covered these two initiatives and the level of effort was approximately equal, therefore, BVES considered dividing the expenditures in half as being reasonable:

- 7.3.2 Situational awareness and forecasting (2.4. Forecast of a fire risk index, fire potential index, or similar)
- 7.3.2 Situational awareness and forecasting (2.6. Weather forecasting and estimating impacts on electric lines and equipment)

The following initiatives in 2020 had the same expenditure value of \$14,672. These expenditure values are related to BVES's detailed inspection costs (labor for BVES's Field Inspector in time devoted to detailed inspection of assets and vegetation around electric power lines). The level of effort is approximately equal, therefore, BVES considered dividing the expenditures in half as being reasonable. (Note that these expenditures are already in rates and are not considered incremental; therefore, BVES will not seek recovery of these particular expenditures in its WMP memorandum account):

- 7.3.4 Asset management and inspections (4.1. Detailed inspections of distribution electric lines and equipment)
- 7.3.5 Vegetation management and inspections (5.2. Detailed inspections of vegetation around distribution electric lines and equipment)

The following initiatives in 2020 had the same expenditure value of \$34,236. These expenditure values are related to BVES's patrol inspection costs (labor for BVES's Field Inspector in time devoted to patrol inspection of assets and vegetation around electric power lines). The level of effort is approximately equal, therefore, BVES considered dividing the expenditures in half as being reasonable. (Note that these expenditures are already in rates and are not considered incremental; therefore, BVES will not seek recovery of these particular expenditures in its WMP memorandum account):

- 7.3.4 Asset management and inspections (4.11. Patrol inspections of distribution electric lines and equipment)
- 7.3.5 Vegetation management and inspections (5.11. Patrol inspections of vegetation around distribution electric lines and equipment)

The following initiatives in 2020 had the same expenditure value of \$38,535. These expenditures are related to BVES's 3rd Party Ground Patrol asset and vegetation inspections. BVES's contract with a 3rd party to conduct ground patrols of BVES assets and vegetation around electric power lines covered these two initiatives and the level of effort was approximately equal, therefore, BVES considered dividing the expenditures in half as being reasonable:

- 7.3.4 Asset management and inspections (4.9.1. Other discretionary inspection of distribution electric lines and equipment, beyond inspections mandated by rules and regulations)
- 7.3.5 Vegetation management and inspections (5.9.a. Other discretionary inspection of vegetation around distribution electric lines and equipment, beyond inspections mandated by rules and regulations)

The following initiatives in 2020 had the same expenditure value of \$105,060. These expenditures are related to BVES's LiDAR asset and vegetation inspections. BVES's contract to conduct LiDAR inspection of BVES assets and vegetation around electric power lines covered these two initiatives and the level of effort was approximately equal, therefore, BVES considered dividing the expenditures in half as being reasonable:

- 7.3.4 Asset management and inspections (4.7. LiDAR inspections of distribution electric lines and equipment)
- 7.3.5 Vegetation management and inspections (5.7. LiDAR inspections of vegetation around distribution electric lines and equipment)

The following initiatives in 2020 had the same expenditure value of \$103,533. These expenditures are related to BVES's all-inclusive vegetation management contract. These initiatives were estimated to about 5% of the vegetation management contractor's level of effort and, therefore, are equal in value and considered by BVES to be a reasonable estimate of the cost:

- 7.3.5 Vegetation management and inspections (5.15. Remediation of at-risk species)
- 7.3.5 Vegetation management and inspections (5.16. Removal and remediation of trees with strike potential to electric lines and equipment)
- 7.3.5 Vegetation management and inspections (5.19. Vegetation inventory system)
- 7.3.5 Vegetation management and inspections (5.5. Fuel management and reduction of "slash" from vegetation management activities)

1.b. Yes.

1.c. When BVES made the following statement, “BVES does not have any wildfire mitigation measures in its Wildfire Mitigation Plan that cannot be disaggregated.”, it was interpreting the issue of disaggregation to only be applicable to initiatives BVES was reporting on. Since, this statement and the revision notice, which required BVES to report on each initiative in the guidelines, BVES had to develop methodologies to disaggregate costs that were previously reported under a single initiative.

- 2. BVES’s Revised Table 12 contains a number of initiatives that share the same dollar amount for 2021 projected expenditures. For example, 11 separate wildfire mitigation initiatives have the same projected expenditure amount of \$6,873 (see Attachment, Column E).**
- a. For each group of initiatives that share the same dollar amount for 2021 projected expenditures, as described above,**
 - i. Explain why the initiatives have the exact same dollar amount.**
 - ii. Explain why BVES’s budget projection methodology for this group of initiatives is reasonable.**
 - b. For the initiatives that have the same projected dollar amount, as described above, is BVES tracking the 2021 expenditures for each of those initiatives separately?**
 - c. If the answer to b) above is no, please explain and reconcile BVES’s response with its statement regarding disaggregation of expenditures as noted below by the WSD in its May 4, 2021 Revision Notice:**

On July 13, 2020, BVES sent the WSD a letter in accordance with Ordering Paragraph 11 of Resolution WSD-002, in which it stated that, “BVES does not have any wildfire mitigation measures in its Wildfire Mitigation Plan that cannot be disaggregated.” (footnote excluded)

Response:

2.a.(i. & ii.). In Wildfire Safety Division’s Revision Notice for Bear Valley Electric Service, Inc.’s 2021 Wildfire Mitigation Plan Update of May 4, 2021, it is stated that BVES shall submit a revised Table 12 in which expenditures are reported for each individual initiative identified in its 2021 WMP Update. Since BVES had aggregated many initiatives into single initiatives, the costs of many initiatives in its original WMP submission were also aggregated. BVES has since developed a methodology to disaggregate the initiatives and their respective costs to better align with WMP Guidelines. This methodology carried through on some budgeted initiatives for 2021 and 2022.

The following initiatives for 2021 have the same budgeted value of \$6,751, which was based on the initiative being primarily a management/supervisory level of effort estimated at 2% management/supervisory time devoted to the initiative (these budgeted values are already in rates and are not considered incremental; therefore, BVES will not seek recovery of these particular expenditures in its WMP memorandum account):

- 7.3.6 Grid operations and protocols (6.3. Personnel work procedures and training in conditions of elevated fire risk)
- 7.3.6 Grid operations and protocols (6.4. Protocols for PSPS re-energization)
- 7.3.6 Grid operations and protocols (6.5. PSPS events and mitigation of PSPS impacts)
- 7.3.7 Data governance (7.3. Documentation and disclosure of wildfire-related data and algorithms)
- 7.3.7 Data governance (7.4. Tracking and analysis of risk event data)
- 7.3.8 Resource allocation methodology (8.1. Allocation methodology development and application)
- 7.3.9 Emergency planning and preparedness (9.1. Adequate and trained workforce for service restoration)
- 7.3.9 Emergency planning and preparedness (9.4. Disaster and emergency preparedness plan)
- 7.3.9 Emergency planning and preparedness (9.5. Preparedness and planning for service restoration)
- 7.3.9 Emergency planning and preparedness (9.6. Protocols in place to learn from wildfire events)
- 7.3.10 Stakeholder cooperation and community engagement (10.3. Cooperation with suppression agencies)

The following initiatives for 2021 have the same budget value of \$15,000. These initiatives were separately budgeted and it is purely coincidental that the budget values are \$15,000:

- 7.3.9 Emergency planning and preparedness (9.2. Community outreach, public awareness, and communications efforts)
- 7.3.10 Stakeholder cooperation and community engagement (10.2. Cooperation and best practice sharing with agencies outside CA)

The following initiatives in 2021 have the same budget value of \$15,406. These budget values are related to BVES's detailed inspection costs (labor time for BVES's Field Inspector to note assets and vegetation around electric power lines). The level of effort is approximately equal, therefore, BVES considered dividing the total budget in half as being reasonable. (Note that these expenditures are already in rates and are not considered incremental; therefore, BVES will not seek recovery of these particular expenditures in its WMP memorandum account):

- 7.3.4 Asset management and inspections (4.1. Detailed inspections of distribution electric lines and equipment)
- 7.3.5 Vegetation management and inspections (5.2. Detailed inspections of vegetation around distribution electric lines and equipment)

The following initiatives for 2021 have the same budgeted values of \$17,182, which is based on the initiative being primarily a management/supervisory level of effort estimated at 5% management/supervisory time devoted to the initiative (these budgeted values are already in rates and are not considered incremental; therefore, BVES will not seek recovery of these particular expenditures in its WMP memorandum account):

- 7.3.6 Grid operations and protocols (6.1. Automatic recloser operations)
- 7.3.4 Asset management and inspections (4.3. Improvement of inspections)
- 7.3.4 Asset management and inspections (4.14. Quality assurance / quality control of inspections)

The following initiatives for 2021 have the same budgeted values of \$18,302, which is based on the initiatives being part of a project estimated to cost approximately \$128,114 total. By dividing the total project cost by 7, the budget for each initiative is estimated. BVES considers this to be a reasonable budget estimate for each initiative:

- 7.3.1 Risk assessment and mapping (1.1. A summarized risk map showing the overall ignition probability and estimated wildfire consequence along electric lines and equipment)
- 7.3.1 Risk assessment and mapping (1.2. Climate-driven risk map and modelling based on various relevant weather scenarios)
- 7.3.1 Risk assessment and mapping (1.3. Ignition probability mapping showing the probability of ignition along the electric lines and equipment)
- 7.3.1 Risk assessment and mapping (1.4. Initiative mapping and estimation of wildfire and PSPS risk-reduction impact)
- 7.3.1 Risk assessment and mapping (1.5. Match drop simulations showing the potential wildfire consequence of ignitions that occur along the electric lines and equipment)
- 7.3.8 Resource allocation methodology (8.2. Risk reduction scenario development and analysis)
- 7.3.8 Resource allocation methodology (8.3. Risk spend efficiency analysis – not to include PSPS)

The following initiatives for 2021 have the same budget value of \$22,500. These expenditures are related to BVES's weather consulting contract for 2021. BVES's weather consulting services cover these two initiatives and the level of effort is estimated to be approximately equal, therefore, BVES considered dividing the budgeted contract value in half as being reasonable to estimate the budget for each initiative:

- 7.3.2 Situational awareness and forecasting (2.4. Forecast of a fire risk index, fire potential index, or similar)
- 7.3.2 Situational awareness and forecasting (2.6. Weather forecasting and estimating impacts on electric lines and equipment)

The following initiatives for 2021 have the same budget value of \$35,948. These budget values are related to BVES's patrol inspection costs (labor for BVES's Field Inspector in time devoted to patrol inspection of assets and vegetation around electric power lines). The level of effort is approximately equal, therefore, BVES considers dividing the total budget in half as being reasonable. (Note that these budgets are already in rates and are not considered incremental; therefore, BVES will not seek recovery of these particular expenditures in its WMP memorandum account):

- 7.3.4 Asset management and inspections (4.11. Patrol inspections of distribution electric lines and equipment)
- 7.3.5 Vegetation management and inspections (5.11. Patrol inspections of vegetation around distribution electric lines and equipment)

The following initiatives for 2021 have the same budget values for 2021 of \$39,367. The budgets are based on a combination of 5% of management/supervisory level of effort and 15% of contracted forester time. BVES considers these budget estimates to be reasonable:

- 7.3.5 Vegetation management and inspections (5.1. Additional efforts to manage community and environmental impacts)
- 7.3.5 Vegetation management and inspections (5.6. Improvement of inspections)

The following initiatives planned for 2021 have the same budget value of \$45,000. These budgets are related to BVES's 3rd Party Ground Patrol asset and vegetation inspections. BVES's contract with a 3rd party to conduct ground patrols of BVES assets and vegetation around electric power lines cover these two initiatives and the level of effort was approximately equal, therefore, BVES considers dividing the total contract value in half as being reasonable:

- 7.3.4 Asset management and inspections (4.9.1. Other discretionary inspection of distribution electric lines and equipment, beyond inspections mandated by rules and regulations)
- 7.3.5 Vegetation management and inspections (5.9.a. Other discretionary inspection of vegetation around distribution electric lines and equipment, beyond inspections mandated by rules and regulations)

The following 2021 initiatives have the same budgeted amount of \$60,000. They are all related to performing UAV inspection using HD imagery and thermography of BVES assets and vegetation around electric power lines. This is an all-inclusive contract budgeted at \$180,000. BVES considers dividing the total contract value by 3 as a reasonable estimate for the budgets:

- 7.3.4 Asset management and inspections (4.4. Infrared inspections of distribution electric lines and equipment)
- 7.3.4 Asset management and inspections (4.9.2. Other discretionary inspection of distribution electric lines and equipment, beyond inspections mandated by rules and regulations)
- 7.3.5 Vegetation management and inspections (5.9.b. Other discretionary inspection of vegetation around distribution electric lines and equipment, beyond inspections mandated by rules and regulations)

The following initiatives for 2021 have the same budget value of \$120,000. These expenditures are related to BVES's LiDAR asset and vegetation inspections. BVES's contract to conduct LiDAR inspection of BVES assets and vegetation around electric power lines cover these two initiatives and the level of effort is approximately equal, therefore, BVES considers dividing the budgeted contract value in half as being reasonable:

- 7.3.4 Asset management and inspections (4.7. LiDAR inspections of distribution electric lines and equipment)
- 7.3.5 Vegetation management and inspections (5.7. LiDAR inspections of vegetation around distribution electric lines and equipment)

The following initiatives for 2021 have the same budget value of \$144,790. These expenditures are related to BVES's all-inclusive vegetation management contract and forester contract. These initiatives are estimated to about 5% of the vegetation management contractor's level of effort and 10% of the forester's labor time. BVES considers this budgetary estimate reasonable:

- 7.3.5 Vegetation management and inspections (5.15. Remediation of at-risk species)

- 7.3.5 Vegetation management and inspections (5.16. Removal and remediation of trees with strike potential to electric lines and equipment)
- 7.3.5 Vegetation management and inspections (5.19. Vegetation inventory system)

2.b. Some initiatives Yes and some No.

2.c. When BVES made the following statement, “BVES does not have any wildfire mitigation measures in its Wildfire Mitigation Plan that cannot be disaggregated.”, it was interpreting the issue of disaggregation to only be applicable to initiatives BVES was reporting on. Since, this statement and the revision notice, which required BVES to report on each initiative in the guidelines, BVES had to develop methodologies to disaggregate costs that were previously reported under a single initiative.

3. BVES’s Revised Table 12 contains a number of initiatives that share the same dollar amount for 2022 projected expenditures. For example, 11 separate wildfire mitigation initiatives have the same projected expenditure amount of \$7,137 (see Attachment, Column F).

- a. **For each group of initiatives that share the same dollar amount for 2022 projected expenditures, as described above,**
 - i. **Explain why the initiatives have the exact same dollar amount.**
 - ii. **Explain why BVES’s budget projection methodology for this group of initiatives is reasonable.**
- b. **For the initiatives that have the same projected dollar amount, as described above, will BVES be tracking the 2022 expenditures for each of those initiatives separately?**
- c. **If the answer to b) above is no, please explain and reconcile BVES’s response with its statement regarding disaggregation of expenditures as noted below by the WSD in its May 4, 2021 Revision Notice:**

On July 13, 2020, BVES sent the WSD a letter in accordance with Ordering Paragraph 11 of Resolution WSD-002, in which it stated that, “BVES does not have any wildfire mitigation measures in its Wildfire Mitigation Plan that cannot be disaggregated.” (footnote excluded)

Response:

3.a.(i. & ii.). In Wildfire Safety Division’s Revision Notice for Bear Valley Electric Service, Inc.’s 2021 Wildfire Mitigation Plan Update of May 4, 2021, it is stated that BVES shall submit a revised Table 12 in which expenditures are reported for each individual initiative identified in its 2021 WMP Update. Since BVES had aggregated many initiatives into single initiatives, the costs of many initiatives in its original WMP submission were also aggregated. BVES has since developed a methodology to disaggregate the initiatives and their respective costs to better align with WMP Guidelines. This methodology carried through on some budgeted initiatives for 2021 and 2022.

The following initiatives for 2022 have the same budgeted value of \$7,137, which was based on the initiative being primarily a management/supervisory level of effort estimated at 2% management/supervisory time devoted to the initiative (these budgeted values are already in rates and are not considered incremental; therefore, BVES will not seek recovery of these particular expenditures in its WMP memorandum account):

- 7.3.1 Risk assessment and mapping (1.1. A summarized risk map showing the overall ignition probability and estimated wildfire consequence along electric lines and equipment)
- 7.3.1 Risk assessment and mapping (1.2. Climate-driven risk map and modelling based on various relevant weather scenarios)
- 7.3.1 Risk assessment and mapping (1.3. Ignition probability mapping showing the probability of ignition along the electric lines and equipment)
- 7.3.1 Risk assessment and mapping (1.4. Initiative mapping and estimation of wildfire and PSPS risk-reduction impact)
- 7.3.1 Risk assessment and mapping (1.5. Match drop simulations showing the potential wildfire consequence of ignitions that occur along the electric lines and equipment)
- 7.3.6 Grid operations and protocols (6.3. Personnel work procedures and training in conditions of elevated fire risk)
- 7.3.6 Grid operations and protocols (6.4. Protocols for PSPS re-energization)
- 7.3.6 Grid operations and protocols (6.5. PSPS events and mitigation of PSPS impacts)
- 7.3.7 Data governance (7.3. Documentation and disclosure of wildfire-related data and algorithms)
- 7.3.7 Data governance (7.4. Tracking and analysis of risk event data)
- 7.3.8 Resource allocation methodology (8.1. Allocation methodology development and application)
- 7.3.8 Resource allocation methodology (8.2. Risk reduction scenario development and analysis)
- 7.3.8 Resource allocation methodology (8.3. Risk spend efficiency analysis – not to include PSPS)

- 7.3.9 Emergency planning and preparedness (9.1. Adequate and trained workforce for service restoration)
- 7.3.9 Emergency planning and preparedness (9.4. Disaster and emergency preparedness plan)
- 7.3.9 Emergency planning and preparedness (9.5. Preparedness and planning for service restoration)
- 7.3.9 Emergency planning and preparedness (9.6. Protocols in place to learn from wildfire events)
- 7.3.10 Stakeholder cooperation and community engagement (10.3. Cooperation with suppression agencies)

The following initiatives for 2022 have the same expenditure value of \$16,176. These budget values are related to BVES's detailed inspection costs (labor for BVES's Field Inspector in time devoted to detailed inspection of assets and vegetation around electric power lines). The level of effort is approximately equal, therefore, BVES considers dividing the total budget for the inspector's labor in half as being reasonable. (Note that these expenditures are already in rates and are not considered incremental; therefore, BVES will not seek recovery of these particular expenditures in its WMP memorandum account):

- 7.3.4 Asset management and inspections (4.1. Detailed inspections of distribution electric lines and equipment)
- 7.3.5 Vegetation management and inspections (5.2. Detailed inspections of vegetation around distribution electric lines and equipment)

The following initiatives for 2022 have the same budgeted values of \$17,842, which is based on the initiative being primarily a management/supervisory level of effort estimated at 5% management/supervisory time devoted to the initiative (these budgeted values are already in rates and are not considered incremental; therefore, BVES will not seek recovery of these particular expenditures in its WMP memorandum account):

- 7.3.6 Grid operations and protocols (6.1. Automatic recloser operations)
- 7.3.4 Asset management and inspections (4.3. Improvement of inspections)
- 7.3.4 Asset management and inspections (4.14. Quality assurance / quality control of inspections)

The following initiatives for 2022 have the same budget value of \$22,500. These expenditures are related to BVES's weather consulting contract for 2022. BVES's weather consulting services cover these two initiatives and the level of effort is estimated to be approximately equal, therefore, BVES considered dividing the budgeted contract value in half as being reasonable to estimate the budget for each initiative:

- 7.3.2 Situational awareness and forecasting (2.4. Forecast of a fire risk index, fire potential index, or similar)
- 7.3.2 Situational awareness and forecasting (2.6. Weather forecasting and estimating impacts on electric lines and equipment)

The following initiatives for 2022 have the same budget value of \$37,745. These budget values are related to BVES's patrol inspection costs (labor for BVES's Field Inspector in time devoted to patrol inspection of assets and vegetation around electric power lines). The level of effort is approximately equal, therefore, BVES considers dividing the total budget in half as being reasonable. (Note that these budgets are already in rates and are not considered incremental; therefore, BVES will not seek recovery of these particular expenditures in its WMP memorandum account):

- 7.3.4 Asset management and inspections (4.11. Patrol inspections of distribution electric lines and equipment)
- 7.3.5 Vegetation management and inspections (5.11. Patrol inspections of vegetation around distribution electric lines and equipment)

The following initiatives for 2022 have the same budget value of \$40,027. The budgets are based on a combination of 5% of management/supervisory level of effort and 15% of contracted forester time. BVES considers these budget estimates to be reasonable:

- 7.3.5 Vegetation management and inspections (5.1. Additional efforts to manage community and environmental impacts)
- 7.3.5 Vegetation management and inspections (5.6. Improvement of inspections)

The following initiatives planned for 2022 have the same budget value of \$45,000. These budgets are related to BVES's 3rd Party Ground Patrol asset and vegetation inspections. BVES's contract with a 3rd party to conduct ground patrols of BVES assets and vegetation around electric power lines cover these two initiatives and the level of effort was approximately equal, therefore, BVES considers dividing the total contract value in half as being reasonable:

- 7.3.4 Asset management and inspections (4.9.1. Other discretionary inspection of distribution electric lines and equipment, beyond inspections mandated by rules and regulations)
- 7.3.5 Vegetation management and inspections (5.9.a. Other discretionary inspection of vegetation around distribution electric lines and equipment, beyond inspections mandated by rules and regulations)

The following 2022 initiatives have the same budgeted amount of \$60,000. They are all related to performing UAV inspection using HD imagery and thermography of BVES assets and vegetation around electric power lines. This is an all-inclusive contract budgeted at \$180,000. BVES considers dividing the total contract value by 3 as a reasonable estimate for the budgets:

- 7.3.4 Asset management and inspections (4.4. Infrared inspections of distribution electric lines and equipment)
- 7.3.4 Asset management and inspections (4.9.2. Other discretionary inspection of distribution electric lines and equipment, beyond inspections mandated by rules and regulations)
- 7.3.5 Vegetation management and inspections (5.9.b. Other discretionary inspection of vegetation around distribution electric lines and equipment, beyond inspections mandated by rules and regulations)

The following initiatives for 2022 have the same budget value of \$120,000. These expenditures are related to BVES's LiDAR asset and vegetation inspections. BVES's contract to conduct LiDAR inspection of BVES assets and vegetation around electric power lines cover these two initiatives and the level of effort is approximately equal, therefore, BVES considers dividing the budgeted contract value in half as being reasonable:

- 7.3.4 Asset management and inspections (4.7. LiDAR inspections of distribution electric lines and equipment)
- 7.3.5 Vegetation management and inspections (5.7. LiDAR inspections of vegetation around distribution electric lines and equipment)

The following initiatives in 2022 have the same budget value of \$144,790. These expenditures are related to BVES's all-inclusive vegetation management contract and forester contract. These initiatives are estimated to about 5% of the vegetation management contractor's level of effort and 10% of the forester's labor time. BVES considers this budgetary estimate reasonable:

- 7.3.5 Vegetation management and inspections (5.15. Remediation of at-risk species)
- 7.3.5 Vegetation management and inspections (5.16. Removal and remediation of trees with strike potential to electric lines and equipment)
- 7.3.5 Vegetation management and inspections (5.19. Vegetation inventory system)

3.b. No.

3.c. When BVES made the following statement, “BVES does not have any wildfire mitigation measures in its Wildfire Mitigation Plan that cannot be disaggregated.”, it was interpreting the issue of disaggregation to only be applicable to initiatives BVES was reporting on. Since, this statement and the revision notice, which required BVES to report on each initiative in the guidelines, BVES had to develop methodologies to disaggregate costs that were previously reported under a single initiative.