



December 27, 2012

Advice Letter No. 275-E

(U 913 E)

California Public Utilities Commission

Golden State Water Company ("GSWC"), on behalf of its Bear Valley Electric Service ("BVES") Division, hereby transmits for filing an original and three conformed copies of this advice letter with the California Public Utilities Commission ("Commission").

SUBJECT: *BVES Fire Prevention Plan, Pursuant to Ordering Paragraph No. 2 in Decision 12-01-032*

Purpose

This advice letter submits the Commission-ordered BVES Fire Prevention Plan.

Background

The Commission initiated Rulemaking (R.) 08-11-005 on November 6, 2008, entitled "Order Instituting Rulemaking to Revise and Clarify Commission Regulations Relating to the Safety of Electric Utility and Communications Infrastructure Provider Facilities." The Rulemaking was divided into three phases. Phase 1 focused on fire-prevention measures that could be implemented in time for the 2009 fall fire season in southern California. Phase 1 concluded with the issuance of D.09-08-029 on August 20, 2009. In Phase 2, the Commission considered additional new measures to reduce fire hazards associated with overhead power-line facilities and communication facilities. Phase 2 concluded with the issuance of D.12-01-032 on January 12, 2012. In D.12-01-032, the Commission also established Phase 3 of the proceeding for the purpose of developing and adopting additional safety measures and fire-threat maps. Phase 3 of this proceeding is pending.

Ordering Paragraph No. 2 in D. 12-01-032 states,

Each investor-owned electric utility in Southern California shall (i) prepare a fire-prevention plan, and (ii) file and serve a copy of its fire-prevention plan by December 31, 2012, via a Tier 1 compliance advice letter.

Compliance

BVES is submitting the attached "Fire Prevention Plan" (Attachment A). The Fire Prevention Plan outlines the overall fire mitigation measures that BVES has undertaken

for its service territory, which addresses situations where all three of the following conditions occur simultaneously:

- (i) 3-second wind gusts exceed the structural or mechanical design standards for the affected overhead power-line facilities,
- (ii) these 3-second gusts occur during a period of high fire danger, and
- (iii) the affected facilities are located in a high fire-threat area

BVES' Fire Prevention Plan specifies (i) how the BVES will identify the occurrence of 3-second wind gusts that exceed the structural or mechanical design standards for overhead power-line facilities; and (ii) the countermeasures BVES will implement to mitigate the threat of power-line fire ignitions.

Tier Designation

This advice letter is submitted with a Tier 1 designation.

Effective Date

This advice letter will become effective upon filing.

Notice and Protests

A copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties to service list R. 08-11-005 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
ATTN: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
E-mail: EDTariffUnit@cpuc.ca.gov

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.

Correspondence

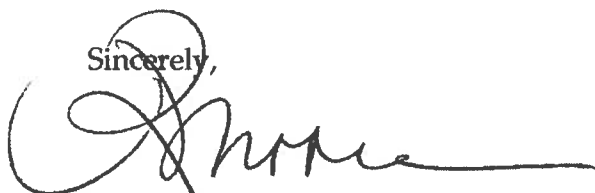
Any correspondence regarding this compliance filing should be sent by regular mail or e-mail to the attention of:

Ronald Moore
Regulatory Affairs
Golden State Water Company
630 East Foothill Blvd.
San Dimas, California 91773
Email: rkmoore@gswater.com

The protest shall set forth the grounds upon which it is based. There is no restriction on who may file a protest.

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,

A handwritten signature in black ink, appearing to read "R. Moore", written over the word "Sincerely,".

Ronald Moore
Regulatory Affairs Dept.
Golden State Water Company

Attachments

c: Edward Randolph, Director, CPUC – Energy Division
Service List R. 08-11-005

Attachment A

BEAR VALLEY ELECTRIC SERVICE



FIRE PREVENTION PLAN

December 2012

Prepared by:
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I. PURPOSE

Bear Valley Electric Service (“BVES”) provides this Fire Prevention Plan in compliance with the California Public Utilities Commission (“Commission”) Decision (“D.”) 12-01-032. In D.12-01-032 and in Ordering Paragraphs 2, 4 and 5 the Commission stipulates the following directives:

OP. 2. Each investor-owned electric utility in Southern California shall (i) prepare a fire prevention plan, and (ii) file and serve a copy of its fire-prevention plan by December 31, 2012, via a Tier 1 compliance advice letter.

OP. 4. The fire prevention plans required by today’s decision shall address situations where all three of the following conditions occur simultaneously: (1) three-second wind gusts exceed the structural or mechanical design standards for the affected overhead power-line facilities, (ii) these three-second gusts occur during a period of high fire danger, and (iii) the affected facilities are located in a high fire-threat area.

OP. 5. The fire-prevention plans required by today’s decision shall specify (i) how the investor-owned electric utility will identify the occurrence of three-second wind gusts that exceed the structural or mechanical design standards for overhead power-line facilities; and (ii) the countermeasures the utility will implement to mitigate the threat of power-line fire ignitions.

BVES Fire Prevention Plan is an inventory of the organizational and operational activities that BVES undertakes in order to address the risk of fire in its service territory. BVES Fire Prevention Plan is a “living document” that is shared with stakeholders, community leaders and the public. The goal is to ensure that the Fire Prevention Plan is continuously improved and to remain effective.

II. GENERAL DESCRIPTION OF BVES SERVICE AREA

BVES service territory is a 17 square mile area surrounding Big Bear Lake located at approximately 7,000 feet in the San Bernardino Mountains. The BVES service area includes the City of Big Bear Lake and the unincorporated areas of San Bernardino County known as Big Bear City, Sugarloaf, Fawnskin, Baldwin Lake, Erwin Lake and Lake Williams. The San Bernardino Mountains and forests are managed by the United States Forest Service, California EPA, and the California Fish and Game.

A. Minimizing Source of Fire Ignition

BVES Fire Prevention Plan is based on the goal of minimizing the probability that the various components of its electric distribution system, which includes one generation plant, 205 miles of overhead and 54 miles of underground conductors and 13 substations, might become the original or contributing source of ignition for a fire. BVES distribution system is interconnected into the California Independent System Operator (“CAISO”) controlled grid through transmission and distribution facilities owned, controlled, and operated by Southern California Edison (“SCE”). In addition, BVES receives imported energy, which is wheeled over the SCE-owned lines, at two delivery points in the BVES system: the Goldhill and the Harnish delivery points.

BVES evaluates the changes and improvements to its physical assets that could and should be made in order to achieve the above noted goal and it also utilizes a maintenance plan consistent with these evaluations.

1. Mapping High Risk Fire Areas in the BVES Service Territory

BVES utilizes the resources provided by the California Department of Forestry and Fire Protection (“CalFIRE”) to map the fire threat areas located within and surrounding the BVES service territory. Mapping data are available on the CalFIRE Fire and Resource Assessment Program (“FRAP”) website.

The 2012 Map of BVES Fire Threat Zone and Highest Risk Fire Area is shown in the Appendix.

2. Inspection Program and Defects Remediation

In compliance with General Order 165, BVES has established an Inspection Program that requires overhead facilities to undergo a detailed inspection every five years and a visual inspection every other year.

- A detailed inspection involves a close visual inspection of the facility that is intended to identify minor defects. These minor defects include, but not limited to: tree clearances, brush clearance, open wire secondary clearance, corona effect on cross-arms, visibility strips and pole-tags, and rotten poles.
- A visual inspection is intended to identify gross defects. These gross defects include, but not limited to: broken cross-arms, damaged insulators, sagging wires and leaking transformers.
- Defects that have been identified are scheduled for repairs in priority order.
- Defects that pose an ignition risk in high fire threat areas must be corrected within 30 days following its detection. These defects include, but not limited to: broken poles, tree limbs on open primary or secondary lines, and downed power lines.
- Non-fire risk defects must be corrected in priority order within 59 months following their detection.

- In addition to the regular inspection of its distribution system, BVES hires a helicopter pilot to fly the system so that Operations and Engineering personnel can inspect its transmission line from the Harnish station located in the Village area of the City of Big Bear Lake to Camp Radford in the Santa Ana Canyon where the SCE line ends. The Radford/Harnish transmission line traverses heavily forested areas and steep mountain slopes. Aerial inspections of this line and the Goldhill Transmission line are performed, at least, once a year.

III. PREVENTIVE MEASURES IN COMPLIANCE WITH COMMISSION ORDER

In D.12-01-032, Ordering Paragraphs 4, the Commission directs BVES Fire Prevention Plan to address situations where two weather conditions and one locational situation occur simultaneously: (i) three-second wind gusts that exceed the design standard of BVES overhead lines; (ii) wind gusts that occur during a period of high fire danger; and (iii) BVES facilities are located in a high fire threat area.

- As shown in the attached Map to BVES Fire Prevention Plan the vast majority of BVES distribution line facilities are located in High (orange color) and Very High Fire Threat areas (red color). Those facilities that are located closer to the lake, where there are fewer trees, are in the Moderate (yellow color) Fire Threat area.
- The National Weather Service broadcasts alerts regarding hot and dry weather as well as high wind conditions in the affected areas and issue “Red Flag Warnings” in relation to high fire threat, high wind gusts and drought conditions in areas of Southern California and San Bernardino County that includes the BVES service territory. In addition, based on the National Weather Service broadcasts, the US Forest Service updates its fire threat warning appropriately. BVES strictly adheres to these warnings and deploys its on-duty personnel to patrol transmission lines.

A. Measures to Mitigate Ignitions

- BVES has implemented an annual tree-trimming and tree inspection program to ensure that branches and debris will be less likely to come into contact with power-lines. The program is in compliance with the minimum vegetation clearances required by GO 95, Rule 35; Table 1.
- BVES’ tree-trimming contractor and BVES crews maintain an aggressive schedule to patrol all lines based on a priority order. Work orders for follow up tree trimming and vegetation management are then created.

- Each summer, BVES de-energize the Radford/Harnish line to prevent potential fire ignition as it traverses heavily forested areas. A detailed inspection of the line is performed in October of each year before the line is re-energized from November through April to serve the winter loads.

IV. COUNTERMEASURES IN COMPLIANCE WITH COMMISSION ORDER

In D.12-01-032, Ordering Paragraphs 5, the Commission directs BVES Fire Prevention Plan to (i) identify the occurrence of three-second wind gusts; and (ii) implement countermeasures to mitigate the threat of power-line ignitions

- In addition to the National Weather Service and the US Forest Service warnings, BVES monitors the Emergency Digital Information Service (“EDIS”) issued by the Governor’s Office of Emergency Services to determine whether a “Red Flag Warning” has been issued. Should a warning has been issued, then BVES will act on the following countermeasures:
 - BVES will repurpose its on-duty field personnel to patrol its overhead lines, provided it is safe to do so.
 - Electrical workers will be directed to clear branches or debris that are discovered to be on or too close to power-lines.
 - BVES operations personnel will monitor three-second wind gusts speed for speeds exceeding 48 mph to set reclosers on overhead lines to non-reclose.
 - Should a circuit outage occur, then the entire affected portion of the circuit must be patrolled to ensure that all defects have been found and remediated before restoring service.

V CHAIN OF RESPONSIBILITY

The Operations Superintendent: This Superintendent is responsible for the maintenance of electric facilities and the supervision of tree trimming tasks by BVES crews along services and primary lines. The Superintendent also oversees overhead lines inspection crews and ensures the follow-up repairs of any found defects.

The Engineering Supervisor: This Supervisor is responsible for fire prevention planning and design. The Supervisor researches and evaluates materials that would reduce fire risk, directs engineers to design new construction in a manner that reduces the risk of fire. The Supervisor also coordinates the protection of BVES electric system to reduce fire risk in the event of power outages.

The Operations and Planning Manager: This Manager is responsible for emergency operations, oversees engineering designs and standards, organizes GO 95/165 inspection cycles, manages operational activities related to the power-on and the de-energize of circuits as needed, and monitors all the compliance to public agencies rules and regulations.

The Emergency Operations Center Director: The Director is responsible for all operations and administration of BVES. During potential catastrophic events, such as red flag warnings, winter storms that might lead to extensive power outages, the Director supervises all aspects of the emergency operations, including regular and timely communications with the media, fire department, city officials, the Sheriff department and other emergency services representatives.

VI. OPERATIONS PLANNING AND TRAINING

BVES Engineering and Operations will continue to evaluate materials and methods to reduce the risk of fire ignition.

- Operations personnel shall be instructed in the correct work practices and in the use of new materials and equipment.
- Training, vegetation management and education relating to fire prevention and mitigation will continue to be a top priority.

BVES strives to maintain safe, reliable service for its facilities and to its customers.

VII. THE BIG BEAR VALLEY COMMUNITY WILDFIRE PROTECTION PLAN

BVES would like to emphasize that this Commission ordered Fire Prevention Plan is not a separate Plan that is unrelated to the communities and districts surrounding its service territory. BVES serves the City of Big Lake as well as unincorporated communities located in the Big Bear Valley. Big Bear Valley is nestled in the San Bernardino National Forest and it supports year round activities for snow skiing, fishing, boating, hiking, mountain biking, etc. More important is that the City of Big Bear Lake and the unincorporated communities are listed in the Federal Registry as communities at high risk to wild fires. The effects of the drought and the alarming increase in the death rate of various trees within the San Bernardino National Forest has led communities in Big Bear Valley to propose measures that can reduce the threat of fire and at the same time restore the health of the forest.

The resulting measures are contained in the Big Bear Valley Community Wildfire Protection Plan, which was collaboratively developed by City of Big Bear Lake Fire Department, Big Bear

City Fire Department, Big Bear Fire Protection District, San Bernardino County Fire Department, and California Department of Forestry and Fire Protection. ¹

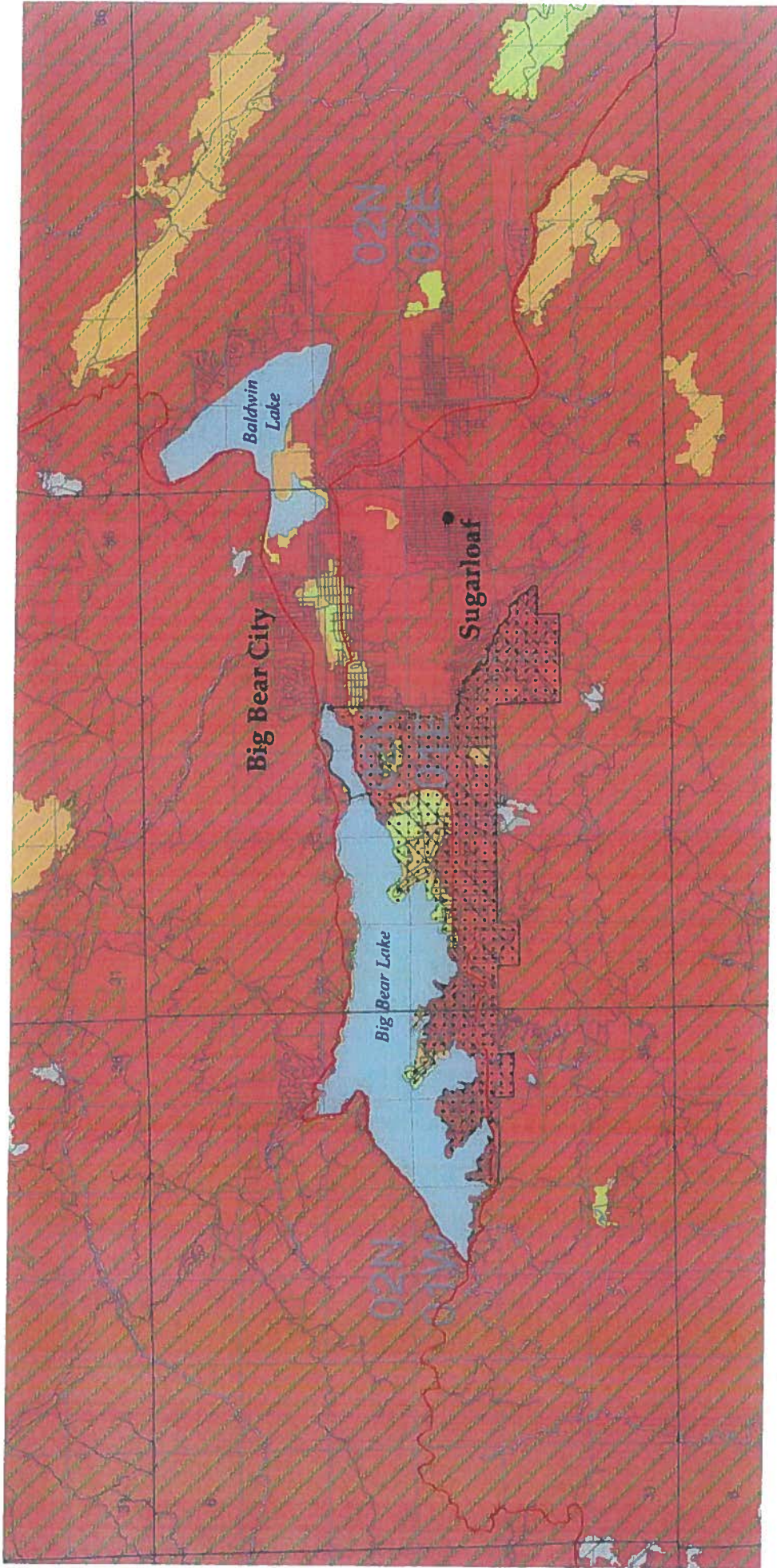
The Bear Valley Community Wildfire Protection Plan recommends 13 mitigation measures. These measures include the prioritization and coordination of mitigation treatments on private/public lands to reduce fire risks while promoting biodiversity, the review of fire related building codes, the mandates to develop a landscape plan on all new dwellings and a minimum setback of 5 and/or 10 feet separation between dwellings, the establishment of oversight functions with City/County Fire departments, the administration of a public education and outreach program, the search for funds to construct a dedicated emergency operations center, the implementation of vegetation management on public and private properties, the involvement of timber harvesters and environmental groups to identify the beneficial use of trees that have been removed and the restoration of forests.

VIII. CONCLUSION

The BVES Fire Prevention Plan is part and parcel of the wider ranging Bear Valley Community Wildfire Protection Plan. The former is a “living document” that is closely related to the latter as part of BVES mission to provide its customers safe and reliable services.

¹ Source: Big Bear Valley Community Wildfire Protection Plan, Final Plan “A Systems Approach”, June 2006 and Addendum, October 2010

APPENDIX
BVES FIRE THREAT MAP



FIRE HAZARD ZONES

 Moderate

 High

 Very High

 Non-wildland fuels (e.g. rock, agriculture, water)

 Urbanized/developed areas outside of hazard zones

FIRE PROTECTION RESPONSIBILITY

 Federal Responsibility Area (FRA)

 Local Responsibility Area (LRA)

 Incorporated Area

GOLDEN STATE WATER COMPANY

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P. O. Box 558
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City Clerk
City of Big Bear Lake
P. O. Box 2800
Big Bear Lake, CA 92315

City Attorney
City of Big Bear Lake
P. O. Box 2800
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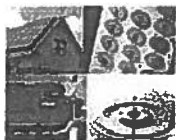
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California Public Utilities Commission

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