



**Via Electronic Mail**

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Subject: Reply Comments to Cal Advocates Comments on Bear Valley Electric Service, Inc. 2020 Wildfire Mitigation Plan.

## **I. BACKGROUND**

In response to the Public Advocate's Office of the California Public Utilities Commission (Cal Advocates) comments on Bear Valley Electric Service Inc.'s (BVES) 2020 Wildfire Mitigation Plan (WMP) submitted on September 18, 2020, BVES submits hereto its reply comments.

In its October 19, 2020, comments Cal Advocates recommend that the Wildfire Safety Division (WSD) should require BVES to provide a plan to inspect the Radford Line prior to re-energization. In addition, the Cal Advocates claim that WSD should require BVES to perform a study of the potential ignition risk from its proposed battery energy storage system. BVES' reply comments address these two recommendations.

## **II. DISCUSSION**

### **A. BVES Currently Inspects the Radford Line Prior to Re-energization.**

BVES appreciates Cal Advocates description of BVES' unique characteristics of its mountainous and forested service area, which is also wholly designated as high fire threat district

Tier 2 or Tier 3. BVES receives imported energy, which is transmitted over Southern California Edison (SCE) owned lines, at two delivery points in its system: the Goldhill and Harnish delivery points. The Goldhill delivery point is located on the north side of BVES service territory at SCE' Goldhill Transfer Station. The SCE 34.5 kV transmission line originates at SCE Cottonwood substation located in the Lucerne Valley, traverses up through steep mountainous terrains and terminates at Goldhill. Normally, this SCE line is not de-energized during the summer months.

In contrast, the Harnish delivery point is located on the south side of BVES' service territory near the downtown area of the City of Big Bear Lake at the Harnish Metering Station. Power comes into the Harnish Metering Station through SCE's Bear Valley Line, which originates in Yucaipa located at the foothill of the San Bernardino Mountains and terminates at an elevation of 5,840 feet at Camp Radford. BVES owns and operates the line from Camp Radford to the Harnish Metering Station, which is also known as the Radford Line. As constructed, the Radford Line goes through tall evergreen and deciduous forests areas and steep terrains. To maintain reliability and safety of its system, BVES personnel de-energize the Radford Line during the dry fire season months to prevent vegetation from touching the line and starting a wildfire. Cal Advocates notes that BVES de-energizes the Radford Line for seven months from April through October to reduce wildfire risk.<sup>1</sup>

Cal Advocates recommends that the WSD require BVES to inspect the Radford Line prior to the re-energization. It also states that BVES should submit in its reply comments its procedures for inspecting the Radford Line prior to re-energization. Cal Advocates claim that, at a minimum, BVES should provide the same level of damage inspections that BVES performs prior to re-energizing circuits following public safety shut off (PSPS) events. And finally, WSD recommends that BVES should include its inspection plan in its 2021 WMP update.<sup>2</sup>

BVES service territory endures cold weather, heavy rain, high winds and heavy snow during the winter months lasting from November through March. Thus, to ensure that the Radford Line is clear from tall vegetation to reliably and safely perform during harsh winter conditions BVES personnel currently inspect the length of the Radford line prior to its re-energization in November. This inspection procedure includes BVES's Field Inspector performing a foot-patrol inspection of the entire line in accordance with the inspection requirements of G.O.-95 Rule 18

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<sup>1</sup> Cal Advocates Comments at p. 2.

<sup>2</sup> Id. at p. 3.

and G.O.-165. The results of the foot-patrol inspections are reviewed by BVES's Field Operations Supervisor and Field Inspector. Items noted are addressed per G.O.-95 Rule 18 guidance and, in addition, certain items are designated as "must resolve" prior to energizing the Radford Line. These inspection procedures are more rigorous than BVES's current PSPS re-energization inspection procedures.

BVES agrees to include its Radford Line re-energization inspection plan in its 2021 WMP update.

**B. It Is Premature To Require BVES to Perform a Study of the Potential Ignition Risk From a Battery Energy Storage System.**

BVES appreciates Cal Advocates raising the issue of a lithium-ion battery energy storage system (BESS) potential to combust or explode and cause a wildfire.<sup>3</sup> In its September 18 2020 WMP, BVES notes that it is in the planning stages for a BESS to complement the proposed Bear Valley Solar Energy Project (BVSEP), 8-megawatt alternating current single-axis tracker solar generation facility.<sup>4</sup> In March 2019 BVES filed an application with the Commission to construct the BVSEP. In June 2020, the selected project builder terminated the contractual agreement due to the potential inundation of the project site. In September 2020, BVES filed the motion to withdraw the application.

No final determination has been made regarding a BESS<sup>5</sup>, or the battery technology that BVES would recommend.<sup>6</sup> Nor has an application for approval of a BESS been filed with the Commission.<sup>7</sup>

It is premature, and possibly a waste of customers' money, to require an analysis in BVES's 2021 WMP update of potential safety issues when BVES has not reached any final determination on, or filed an application seeking approval of, *any* type of battery energy storage project.

In the event BVES ultimately decides to pursue a BESS, an analysis of any safety issues, including any potential ignition risk posed by the construction of the BESS, will be included in an

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<sup>3</sup> Cal Advocates Comments at pp. 3-4.

<sup>4</sup> 2020 WMP, pp. 124 – 125.

<sup>5</sup> BVES states in its 2020 WMP that an application for approval will be filed if BVES should determine a BESS is in the best interest of BVES's customers. See 2020 WMP at p. 125.

<sup>6</sup> BVES states in its 2020 WMP that it is considering multiple battery chemistries and applications

<sup>7</sup> Id.

application seeking approval of the Commission. Cal Advocates recommendation should be deferred at this time.

Respectfully submitted

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