



December 1, 2023

Mr. Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

RE: ESRB Audit EA2023-1078

Dear Mr. Fadi Daye,

This letter is provided in accordance with Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC) letter EA2023-1078 of November 1, 2023 to detail all of corrective measures taken by Bear Valley Electric Service, Inc. (BVES) to remedy and prevent the violations of one or more General Orders (GOs) your staff identified during the electric distribution audit of BVES from July 10, 2023 to July 14, 2023.

The electric distribution audit included review of distribution inspection and maintenance records and field inspection of distribution facilities. The following documents were reviewed by the ESRB Audit Team:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Safety hazard notifications.
- Pole loading calculations records.
- Intrusive testing records.
- Vegetation management records.
- BVES' documented inspection program.

The ESRB Audit Team also conducted field inspection of 79 poles and 21 pad mounted devices in the BVES electric distribution system. For the violations of General Orders that the ESRB Audit Team noted, the following corrective action was taken:

**Item 1. Violation Description: GO 95, Rule 51.6-A: High Voltage Marking of Poles**

The high voltage signs on each of the following BVES poles were damaged and/or missing for Pole 15135BV, Pole CTC63210, and Pole 5584BV.

**Corrective Action:** "HIGH VOLTAGE" signs were installed on the discrepant poles. Field Operations staff reviewed the requirements of GO 95, Rule 51.6-A to better understand the requirements for "HIGH VOLTAGE" signs and the importance of taking action in a timely manner to document and correct "HIGH VOLTAGE" sign discrepancies when noted was emphasized.

**Item 2. Violation Description: General Order 95, Rule 37**

BVES primary conductors supported on Pole 5371BV had less than 48 inches of radial clearance from vegetation.

**Corrective Action:** The vegetation surrounding the primary conductors attached to Pole 5371BV was trimmed out to a minimum of 12 feet. Field Operations staff reviewed the requirements of General Order 95, Rule 37 - Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 14, Column E to better understand the requirements for vegetation around primary conductors and the importance of taking action in a timely manner to document and correct vegetation clearance violations when noted was emphasized.

**Item 3. Violation Description: GO 95, Rule 56.2, Uses (Guy Wires)**

The BVES down guy wire supporting each of the following poles was not taut for Poles 15320BV and 15321BV.

**Corrective Action:** Guy Wires were repaired on the discrepant poles. Field Operations staff reviewed the requirements of GO 95, Rule 56.2 Guy Wires to better understand the requirements for guy wires and the importance of taking action in a timely manner to document and correct guy wire discrepancies when noted was emphasized.

**Item 4. Violation Description: GO 95, Rule 31.1, Design, Construction, and Maintenance.**

The following poles are "buddy poles" and should be removed for Poles 15648BV, 14789BV, 12267BV, 5026BV, 8812B, 23924CTC, 10228BV, 3585BV, and 11275BV.

**Corrective Action:** The "buddy poles" are scheduled to be removed by February 15, 2024 on the discrepant poles to achieve compliance with GO 95, Rule 31.1 Design, Construction, and Maintenance. Field Operations staff reviewed the requirements of GO 95, Rule 31.1 Design, Construction, and Maintenance to better understand the requirements for "buddy poles" and the importance of taking action in a timely manner to document and correct "buddy pole" discrepancies when noted was emphasized.

**Item 5. Violation Description: GO 95, Rule 84.6-B, Ground Wires**

The ground moulding on each of the following poles was damaged or missing for Poles 7950BV, 8028BV, 11261BV, 10980BV, 9667BV, and 5584BV.

**Corrective Action:** Ground mouldings were repaired on the discrepant poles. Field Operations staff reviewed the requirements of GO 95, Rule 84.6-B, Ground Wires to better understand the requirements for ground wires and the importance of taking action in a timely manner to document and correct moulding discrepancies when noted was emphasized.

**Item 6. Violation Description: GO 95, Rule 31.1, Design Construction and Maintenance**

The “eye” of the BVES down guy anchor supporting Pole 9667BV was buried.

**Corrective Action:** The eye was repaired on the discrepant pole. Field Operations staff reviewed the requirements of GO 95, Rule 31.1 Design Construction and Maintenance to better understand the requirements for guy anchors and the importance of taking action in a timely manner to document and correct guy anchor discrepancies when noted was emphasized.

**Item 7. Violation Description: GO 95, Rule 91.3-C, Stepping**

The lowest pole step on Pole 8028BV was less than 8 feet from the ground line.

**Corrective Action:** Stepping was repaired on the discrepant pole. Field Operations staff reviewed the requirements of GO 95, Rule 93.3-C, Stepping to better understand the requirements for stepping and the importance of taking action in a timely manner to document and correct stepping discrepancies when noted was emphasized.

**Item 8. Violation Description: GO 128, Rule 32.7, Covers**

The ground cover next to Pad-mounted transformer T138 did not have any bolts to securely close it.

**Corrective Action:** The ground cover was repaired. Field Operations staff reviewed the requirements of GO 128, Rule 32.7, Covers to better understand the requirements for covers and the importance of taking action in a timely manner to document and correct cover discrepancies when noted was emphasized.



Through our regularly scheduled GO 165 inspections and patrols, as well as our third-party inspections, newly hired vegetation staff, BVES will continue to improve in recording and correcting violations as they are identified. Additionally, BVES is augmenting its current inspection platform with new technologies such as LiDAR, UAV Photography and Videography, UAV Thermography, and Satellite Vegetation Inspections, which will likely accelerate identification and correction time for violations. Additionally, BVES has an Independent Third Party perform an additional ground patrol each year over is GO 165 required patrol inspection. BVES is also making a dedicated effort to improve its record keeping to provide streamlined data review for its staff and outside auditors.

Should you have any questions concerning this response, please contact Jon Pecchia at (909) 253-8966 or by email at [jon.pecchia@bvesinc.com](mailto:jon.pecchia@bvesinc.com)

Respectfully,

Paul Marconi  
President, Treasurer, and Secretary  
Bear Valley Electric Service, Inc.