



August 19, 2020

Caroline Thomas Jacobs, Director  
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**Re: Request to Late Submit Comments to Request Bifurcation of BVES 2020 WMP and Supplemental Filings**

**Request to Late Submit Comments**

Bear Valley Electric Service, Inc. (“BVES” or “Bear Valley”) requests permission to late submit the following comments, pursuant to Rule 14.5 of the Commission’s Rules of Practice and Procedure, regarding the July 22, 2020, Wildfire Safety Division (“WSD”) letter from Director Caroline Thomas Jacobs, and the draft Action Statement and draft Resolution No. WSD-010 (“Draft Resolution”) denying approval of Bear Valley’s 2020 Wildfire Mitigation Plan (“WMP”).

**Background**

The draft Action Statement and Draft Resolution deny Bear Valley’s WMP submitted on February 7, 2020, as updated on March 6<sup>th</sup>, and made the subject of an errata submitted on May 22, 2020.<sup>1</sup> The draft Action Statement and Draft Resolution require Bear Valley to file a new 2020 WMP no later than 60 days from the date of mailing of the final Resolution.<sup>2</sup> Bear Valley was also urged to address the Class A and Class B deficiencies in a Remedial Compliance Plan along with its new WMP filing, and to include the information required in the first Quarterly Report.<sup>3</sup> In addition, Bear Valley was directed to concurrently file a supplemental filing explaining how and why the errors in the prior WMP filings were made.<sup>4</sup>

**Request to Bifurcate Filings**

Bear Valley respectfully requests that the draft Action Statement and Draft Resolution be modified to remove the requirement to *concurrently* file the supplemental filing described

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<sup>1</sup> Draft Action Statement at p. 3 and Draft Resolution, Ordering Paragraph #1 at p. 9.

<sup>2</sup> Draft Action Statement at p. 5 and Draft Resolution, Ordering Paragraph #3 at p. 9.

<sup>3</sup> Draft Action Statement at pp. 5-6 and Draft Resolution, Ordering Paragraph #4 at p. 9.

<sup>4</sup> Draft Action Statement at p. 6 and Draft Resolution, Ordering Paragraph #5 at p. 9.

