

**INDUSTRY PUBLIC UTILITIES
WILDFIRE MITIGATION PLAN
2021 INFORMATIONAL RESPONSE**

**RESPONSES TO WILDFIRE SAFETY ADVISORY
BOARD'S 2021 GUIDANCE ADVISORY OPINION**

July 8, 2021

I. PURPOSE OF THIS 2021 INFORMATIONAL RESPONSE

The California Wildfire Safety Advisory Board (WSAB) issued the *Guidance Advisory Opinion for the 2021 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Cooperatives* (“2021 WSAB Guidance Advisory Opinion”) on December 15, 2020. Industry Public Utilities (IPU) provides this document to the WSAB in order to respond to each of the recommendations included in the 2021 WSAB Guidance Advisory Opinion. IPU will provide a narrative response and/or a cross reference to the location in IPU’s Wildfire Mitigation Plan (WMP) where the topic is addressed. Where the recommendation is not applicable to IPU, the response will provide a brief description supporting this conclusion.

II. CONTEXT SETTING INFORMATION

WSAB requested that POU provide an informational table to assist the Staff and Board member in understanding the unique characteristics of each POU.

Table 1: Context-Setting Information

Utility Name	Industry Public Utilities	
Service Territory Size	2 square miles	
Owned Assets	<input type="checkbox"/> Transmission <input checked="" type="checkbox"/> Distribution <input type="checkbox"/> Generation	
Number of Customers Served	114 customer accounts	
Population Within Service Territory	15 residential customer accounts	
Customer Class Makeup	<i>Number of Accounts</i>	<i>Share of Total Load (MWh)</i>
	15 Residential; 30 Small/Medium Business; 69 Commercial/Industrial	0.4 % Residential; 1.5 % Small/Medium Business; 98.1 % Commercial/Industrial
Service Territory Location/Topography¹	100 % Urban	
Service Territory Wildland Urban Interface² (based on total area)	See attached map.	

¹ This data shall be based on the California Department of Forestry and Fire Protection, California Multi-Source Vegetation Layer Map, depicting WHR13 Types (Wildlife Habitat Relationship classes grouped into 13 major land cover types) available at: <https://www.arcgis.com/home/item.html?id=b7ec5d68d8114b1fb2bfbf4665989eb3>.

² This data shall be based on the definitions and maps maintained by the United States Department of Agriculture, as most recently assembled in *The 2010 Wildland-Urban Interface of the Conterminous United States*, available at https://www.fs.fed.us/nrs/pubs/rmap/rmap_nrs8.pdf.

Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	Includes maps not applicable Tier 2: [0]% Tier 3: [0]%
Prevailing Wind Directions & Speeds by Season	<input type="checkbox"/> Includes maps Santa Ana wind conditions usually happen during summer months from May to October but can happen outside summer months. Santa Ana winds are strong gusty winds with speeds which can range from 30 miles per hour as much as 90 miles per hour.
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: 0 miles Overhead Trans.: 0 miles Underground Dist.: 15 circuit miles Underground Trans.: 0 miles
	Explanatory Note 1 - Methodology for Measuring "Miles": 15 circuit miles with multiple circuits in the same duct bank.
	Explanatory Note 2 – Description of Unique Ownership Circumstances: [None]
	Explanatory Note 3 – Additional Relevant Context: all IPU’s electric infrastructure is within the IPU service territory
Percent of Owned Lines in CPUC High Fire Threat Districts	<i>Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)</i>
	Tier 2: 0 % Tier 3: 0 %
	<i>Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)</i>
	Tier 2: 0 % Tier 3: 0 %
Customers have ever lost service due to an IOU PSPS event?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No. All IPU distribution circuits are underground with minimal opportunity for any wildfire originating from IPU distribution system. IPU has three interconnections with Southern California Edison (SCE). One interconnection connects to SCE’s 66,000-Volts overhead sub transmission lines. The other two connect to SCE’s 12,000 Volts overhead distribution lines.
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, then provide the following data for calendar year 2020:

III. CROSS REFERENCE TO STATUTORY REQUIREMENTS

WSAB requested that POUs provide a clear roadmap as to where each statutory requirement is addressed within the POU WMP.

Table 2: Cross References to Statutory Requirements

Requirement	Statutory Language	Location in WMP
Persons Responsible	PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.	Section III-B Page 4
Objectives of the Plan	PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section II Page: 2
Preventive Strategies	PUC § 8387(b)(2)(C): A description of the preventive strategies and programs to be adopted by the local publicly owned electric utility or electrical cooperative to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.	Section V Pages 8 to 11
Evaluation Metrics	PUC § 8387(b)(2)(D): A description of the metrics the local publicly owned electric utility or electrical cooperative plans to use to evaluate the wildfire mitigation plan’s performance and the assumptions that underlie the use of those metrics.	Section VII-A Page 12
Impact of Metrics	PUC § 8387(b)(2)(E): A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	Section VII-B Pages 12-13
Deenergization Protocols	PUC § 8387(b)(2)(F): Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	Section V-D,F Page 9-10
Customer Notification Procedures	PUC § 8387(b)(2)(G): Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure.	Section V-G] Page 10-11
Vegetation Management	PUC § 8387(b)(2)(H): Plans for vegetation management.	Section IV-C Page 8
Inspections	PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility’s or electrical cooperative’s electrical infrastructure.	Section V-C Page 9

<p>Prioritization of Wildfire Risks</p>	<p>PUC § 8387(b)(2)(J): A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility’s or electrical cooperative’s service territory. The list shall include, but not be limited to, both of the following:</p> <p>(i) Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility’s or electrical cooperative’s equipment and facilities.</p> <p>(ii) Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility’s or electrical cooperative’s service territory.</p>	<p>Section IV-B&C Pages 7-8</p>
<p>CPUC Fire Threat Map Adjustments</p>	<p>PUC § 8387(b)(2)(K): Identification of any geographic area in the local publicly owned electric utility’s or electrical cooperative’s service territory that is a higher wildfire threat than is identified in a commission fire threat map, and identification of where the commission should expand a high fire threat district based on new information or changes to the environment.</p>	<p>Section 1-B Page 1 Section V-A Pages 8-9</p>
<p>Enterprisewide Risks</p>	<p>PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk.</p>	<p>Section V-F Page 10</p>
<p>Restoration of Service</p>	<p>PUC § 8387(b)(2)(M): A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.</p>	<p>Section VI Pages 11-12</p>
<p>Monitor and Audit</p>	<p>PUC § 8387(b)(2)(N): A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following</p> <p>(i) Monitor and audit the implementation of the wildfire mitigation plan.</p> <p>(ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies.</p> <p>(iii) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, other applicable statutes, or commission rules.</p>	<p>Section VII-C & VII-D Page 13</p>

<p style="text-align: center;">Qualified Independent Evaluator</p>	<p>PUC § 8387(c): The local publicly owned electric utility or electrical cooperative shall contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The independent evaluator shall issue a report that shall be made available on the Internet Web site of the local publicly owned electric utility or electrical cooperative, and shall present the report at a public meeting of the local publicly owned electric utility’s or electrical cooperative’s governing board.</p>	<p style="text-align: center;">Section [VIII] Pages [13 to 14]</p>
---	---	--

IV. WSAB GUIDANCE ADVISORY OPINION RECOMMENDATIONS

The WSAB Guidance Advisory Opinion identifies 14 specific recommendations that POUs are requested to address in their 2021 WMPs. As specified in Public Utilities Code § 8387(b)(1), each POU is required to perform a comprehensive revision to the POU’s WMP at least once every three years. Pursuant to this guidance, the POUs will be updating their WMPs based on the direction of their local governing boards within this 3-year cycle. Because the WSAB’s recommendations have been provided after the initial WMP submission, the POUs will have varying capacities to fully address each recommendation in their 2021 WMP. This Section IV restates each of the WSAB recommendations and provides an opportunity for each POU to do one or more of the following: (1) provide a narrative response to the recommendation; (2) provide a cross reference to where in the POU’s WMP this topic is addressed; (3) describe why the recommendation is not applicable to the POU; or (4) inform the WSAB of the POU’s intent to address the recommendation at the point of the POU’s next comprehensive revision, occurring in either the 2022 or 2023 WMP.

A. Plan Structure

WSAB Recommendation #1: Provide context-setting information about the POU and provide a simple guide to where the statutory requirements are addressed within the WMP.

POU Response: See Sections II and III above.

WSAB Recommendation #2: Provide a short description of the POU’s public review and approval (if required) for the WMP. This description may also include a brief explanation of the funding mechanisms for wildfire mitigation efforts.

POU Response: The IPU WMP and the qualified independent evaluator’s report was presented to the Industry Public Utilities Commission (IPUC) at the duly noticed regular public meeting on