2026 Wildfire Mitigation Plan

Independent Evaluation

DATE: June 14, 2026

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1. WMP Independent Evaluation

1.1 Executive Summary

California Public Utilities Code § 8387 requires each local publicly owned electric utility and electrical cooperative to construct, maintain, and operate its electrical lines and equipment in a manner that minimizes the risk of wildfire posed by those facilities. The statute also requires publicly owned utilities and electrical cooperatives to prepare and submit wildfire mitigation plans to the California Wildfire Safety Advisory Board on the schedule established under the statute.

In 2019, Assembly Bill 1054 created the California Wildfire Safety Advisory Board. The Board reviews and provides advice on wildfire mitigation plans submitted by publicly owned utilities and electrical cooperatives under Public Utilities Code § 8387. After January 1, 2026, those plans are submitted at least once every four years on a schedule determined by the Wildfire Safety Advisory Board.

This report presents an independent evaluation of Valley Electric Association's Wildfire Mitigation Plan for its California service territory. As described in the WMP, VEA's California system consists of a limited rural distribution footprint in the Fish Lake Valley area, including approximately 48 meters, 314 distribution poles, and 19.9 line miles.

1.2 Evaluator Qualifications (PUC 8387(c))

PUC Section 8387(3)(c) requires all WMPs to be reviewed by a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure. This WMP was reviewed by Vantage Point Solutions (VPS) in June of 2026 for compliance with current PUC code (PUC 8387(b)) which establishes guidelines for the comprehensiveness of electric utility WMPs. This independent evaluation will review each plan element criterion and determine if they are met by the WMP provided by VEA.

Over the past 36 years, VPS has performed numerous electrical system planning studies, electric distribution, transmission, and substation design projects for public power utilities in Alaska, California, Idaho, Oregon, Nevada, and Washington. Since its founding, VPS has worked exclusively with Municipalities, Rural Electric Cooperatives, Rural Electric Associations and Public/People's Utility Districts who have been the core of our customer base. VPS has a well-established history of bringing outstanding qualifications, specialized experience, and technical competence to all projects over our many years of serving public power.

Past utility wildfire mitigation projects include drafting full WMPs, WMP independent evaluations, and wildfire readiness assessments. VPS leadership have presented at numerous public power events on the subject of utility wildfire mitigation planning over the past several years.

1.3 Required WMP Elements

The elements contained in Figure 1 are the basis for all California POU WMPs and must be addressed within the plans. To determine the comprehensiveness of the VEA WMP, each element will be analyzed with respect to the intent of the code as well as industry best management practices for wildfire mitigation, system hardening, and general system resilience.

Table 1. Required WMP Elements

PUC § 8387 (b)	DESCRIPTION	PLAN SECTION
(2)(A)	Responsibilities of persons responsible for executing the plan	Sections 2; Board Resolution
(2)(B)	Objectives of the wildfire mitigation plan	Section 3
(2)(C)	A description of the preventative 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.	4, 6, 8, 9, 10; Appendix A
(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 5
(2)(E)	A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	N/A for initial WMP
(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.	Sections 6.2, 6.3; Appendix C
(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 7.1, 7.3; Appendix C

PUC § 8387 (b)	DESCRIPTION	PLAN SECTION
(2)(H)	Vegetation management plans	Section 9; Appendix D
(2)(I)	Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section 10; Appendix E
(2)(J)	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:	Section 4; Appendix A
(2)(J)(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.	Section 4; Appendix A
(2)(J)(ii)	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.	Section 4; Appendix A
(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.	Section 4; Appendix B
(2)(L)	A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk.	Appendix A
(2)(M)	A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	Section 6.4
(2)(N)	A description of the processes and procedures the local publicly owned electric utility or electric cooperative shall use to do all of the following.	
(2)(N)(i)	Monitor and audit the implementation of the wildfire mitigation plan.	Section 5; Appendix C
(2)(N)(ii)	Identify any deficiencies in the wildfire mitigation plan or its implementation and correct those deficiencies.	Not clearly addressed

PUC § 8387 (b)	DESCRIPTION	PLAN SECTION
(2)(N)(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.	Section 10; Appendix E
(3)	The local or publicly owned electric utility or electrical cooperative shall present each wildfire mitigation plan in an appropriately noticed public meeting. The local or publicly owned electric utility or electrical cooperative shall accept comments on its wildfire mitigation plan from the public, other local and state agencies and interested parties, and shall verify that the WMP complies with all applicable rules, regulations, and standards as appropriate.	Section 11
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.	Section 12; Appendix G

2. Analysis of Plan Elements

For clarity, we will review and analyze each plan element in the order they appear in the PUC 8387 code.

2.1 Responsibilities of Persons Responsible for Executing the Plan

Code requirement: PUC 8387(2)(A)
Location in the plan: Sections 2, Board Resolution

The WMP identifies VEA's management and key personnel responsible for implementing various aspects of the plan. Section 2, Organizational Responsibilities, assigns responsibility to the Director Line Operations as the Plan Owner. In addition, the Board Resolution states that the CEO and the Director of Line Operations are authorized to execute and implement the Plan.

Section 2 further identifies various staff roles in overall organizational responsibilities, including:

- Line Operations
- System Operations Center
- Vegetation Management
- Emergency Management Coordination
- Legal & Regulatory Affairs

2.2 Objectives of the Wildfire Mitigation Plan

Code requirement: PUC 8387(2)(B)
Location in the plan: Section 3

Section 3, Objectives of the Plan, identifies the objectives of VEA's Wildfire Mitigation Plan. The plan states that its objectives are to minimize the risk of utility-caused wildfires, protect public safety, property, and critical infrastructure, enhance coordination with fire suppression agencies, ensure safe and timely restoration of power after a wildfire event, and provide transparency through public meetings, stakeholder engagement, and independent review.

These objectives are consistent with the purpose statement in Section 1, which explains that the WMP is intended to ensure VEA constructs, maintains, and operates its electrical lines and equipment in a manner that will minimize wildfire risk. Section 1 also notes that the California portion of VEA's system is limited in size and primarily located in rural, low-density areas, which provides additional context for the scale and focus of the plan.

The objectives stated in Section 3 provide a clear foundation for the plan's operational and public safety measures, including mitigation activities, agency coordination, outage communications, and service restoration

2.3 Preventive Strategies and Programs

Code requirement: PUC 8387(2)(C)
Location in the plan: Sections 4, 6, 8, 9, 10; Appendix A

VEA's WMP describes a set of preventive strategies and programs intended to minimize the risk of wildfire ignition associated with its electrical system. These measures include covered conductors, recloser upgrades, undergrounding where feasible, vegetation management, and updated design standards, all of which are identified in Section 4, System Risks & Mitigation Strategies.

The plan also identifies preventive operational controls in Section 6 Operating Strategies. These include continuous monitoring of National Weather Service Red Flag Warnings and local conditions, disabling automatic reclosing during Red Flag Warnings or other elevated fire weather conditions as warranted, case-by-case de-energization decisions based on real-time and forecasted conditions, and patrols prior to re-energization.

Additional preventive programs are addressed in Section 8, Coordination with Fire Agencies, Section 9, Vegetation Management, and Section 10, Inspection & Contractor Oversight. These sections describe coordination protocols with fire suppression agencies, vegetation clearance cycles and contractor oversight, inspection cycles, use of technologies such as drones and infrared imaging where appropriate, and quality assurance reviews of contractor-performed inspections.

The plan's prioritized wildfire risk list and risk scoring methodology in Appendix A further support these preventive strategies by identifying the principal wildfire risk drivers in VEA's California service territory and linking those drivers to mitigation approaches such as disabling reclosing, frequent patrols, right-of-way maintenance, and repair or replacement of aging poles and crossarms as needed.

With respect to climate-related risk factors, the plan identifies high wind events, climate factors, drought conditions, fuel moisture, extreme temperatures, and low humidity as relevant environmental and climatological considerations. These factors are described in Section 4 and Appendix A as part of VEA's wildfire risk identification and prioritization framework.

Overall, the WMP presents preventive strategies and programs across the areas of system hardening, operational controls, vegetation management, inspections, and agency coordination. These measures form the basis of VEA's approach to reducing wildfire risk within its California service territory

2.4 Metrics and Assumptions for Evaluating Plan Performance

Code requirement: PUC 8387(2)(D)
Location in the plan: Section 5

Section 5, Performance Metrics & Evaluation, identifies the metrics VEA plans to use to evaluate WMP performance. The section lists utility-caused ignitions, vegetation miles cleared, percent of inspections completed, equipment upgrades installed, and outage notifications as the plan's evaluation metrics.

These measures reflect a mix of outcome-oriented metrics and implementation or completion metrics. Utility-caused ignitions is the metric most directly tied to overall wildfire mitigation performance, while vegetation miles cleared, percent of inspections completed, and equipment upgrades installed function primarily as measures of work performed or program implementation. Outage notifications is also better understood as an operational or program execution measure unless paired with defined timeliness or effectiveness criteria.

Section 5 further states that plan evaluation will include audits, corrective action plans, and the integration of fire investigations into plan revisions. These evaluation processes provide the basic framework VEA will use to review WMP results and incorporate lessons learned into future iterations of the plan.

The plan presents these metrics at a high level and does not separately describe baseline values, numerical targets, or detailed metric-specific assumptions. Accordingly, Section 5 demonstrates that VEA has identified measures for monitoring both plan execution and overall performance, although several of the listed measures are more accurately characterized as implementation indicators than as direct measures of WMP effectiveness.

2.5 Application of Previously Identified Metrics

Code requirement: PUC 8387(2)(E)
Location in the plan: N/A for initial WMP

Because this is VEA's first Wildfire Mitigation Plan, there are no previously established WMP metrics or prior plan results available to inform this filing under PUC 8387(2)(E)

As a result, this requirement is not substantively applicable to VEA's initial WMP in the same manner it would be for a subsequent plan update. Future revisions of the WMP should be able to address this requirement by explaining how the use of the metrics identified in Section 5 informed changes to the plan

2.6 Protocols for Disabling Reclosers, De-energizing Lines, and Public Safety Impacts

Code requirement: PUC 8387(2)(F)
Location in the plan: Sections 6.2, 6.3; Appendix C

The WMP identifies VEA's protocols for disabling automatic reclosing and for evaluating de-energization during elevated wildfire risk conditions. Section 6.2, Reclosing Protocols, states that automatic reclosing may be disabled during Red Flag Warnings or other elevated fire weather conditions. The section further states that reclosing decisions are based on real-time system conditions, weather data, and operational risk assessments.

VEA's de-energization protocols are addressed in Section 6.3, De-Energization Protocols. That section states that de-energization decisions are made on a case-by-case basis using real-time and forecasted conditions, including high winds, low humidity, dry vegetation, active fire conditions, infrastructure risk, and impacts to essential services. The WMP also explains that VEA's California service territory is served through a radial configuration dependent on upstream Southern California Edison infrastructure and may therefore be de-energized during SCE Public Safety Power Shutoff events.

Section 6.3 further states that SCE's publicly documented PSPS framework considers factors such as high winds, low humidity, dry vegetation, and operational conditions, including baseline activation thresholds of approximately 31 mph sustained winds and 46 mph gusts for bare conductor circuits. The WMP states that the Fish Lake Valley/Oasis area is served by bare conductor facilities and that VEA would use similar baseline thresholds when evaluating local de-energization considerations and operational response actions.

The WMP also addresses public safety impacts associated with wildfire response and outage conditions through coordination procedures in Appendix C. Appendix C states that when a wildfire threatens VEA infrastructure, VEA and BLM exchange information regarding fire location, projected movement, line status, safety hazards, and critical infrastructure concerns, and make a joint decision regarding de-energization. It also addresses coordination related to outages affecting critical facilities and emergency response operations. Overall, the WMP addresses the operational triggers and decision factors for disabling reclosing and de-energizing lines, and it considers associated public safety impacts in connection with essential services and wildfire response coordination.

2.7 Customer Notification Prior to De-energizing Electrical Lines

Code requirement: PUC 8387(2)(G)
Location in the plan: Sections 7.1, 7.3; Appendix C

The WMP addresses customer notification for planned outages at a general level. Section 7.1, Planned Outages, states that VEA provides advanced notice to customers via text messages, robocalls, and postings on VEA's website.

The plan provides more specific notification direction for critical facilities, telecommunications providers, first responders, and agency contacts than for the general customer population. Section 7.3, Public Safety Notifications, states that these parties are notified in accordance with Appendix C.

Appendix C further states that when a planned or unplanned outage affects BLM or other critical facilities, VEA notifies the appropriate fire dispatch center and provides information regarding estimated outage duration, backup system activation status, and restoration timeline. Appendix C also describes coordination when wildfire threatens VEA infrastructure, including communication regarding line status, safety hazards, and critical infrastructure concerns.

Section 7.2, Unplanned Outages, states that VEA's outage map is updated in real time and that updates are also provided by text message. While this supports the plan's broader outage communications framework, it is not specific to advance notification prior to de-energization.

Overall, the WMP identifies feasible procedures for notifying customers who may be affected by de-energization, but the customer-facing discussion is brief. The plan's more detailed notification protocols are directed to critical facilities, telecommunications infrastructure, first responders, and agency coordination.

2.8 Plans for Vegetation Management

Code requirement: PUC 8387(2)(H)
Location in the plan: Section 9; Appendix D

Section 9 states that vegetation management on distribution circuits is maintained on an approximate three-year trimming cycle, with additional work performed as needed based on inspections, observed conditions, or operational requirements. The section also states that clearance distances are maintained in line with or exceeding applicable CPUC and RUS standards.

Appendix D provides additional detail regarding program objectives, clearance distances, cycle frequency, and contractor oversight. It identifies stated clearance standards of 10 feet to wire for distribution facilities and 16 feet to wire for transmission facilities, states that vegetation management is performed on a three-year cycle and provides that VEA audits at least 10% of contractor work for compliance.

The WMP demonstrates that VEA has a vegetation management program and identifies basic program elements, including cycle frequency, clearances, and contractor oversight. For a utility of VEA's size and limited California footprint, this provides a reasonable basis for addressing the vegetation management requirement.

The discussion is relatively brief, however, and the body of the plan does not identify the specific CPUC or other clearance standards being applied. Appendix D provides some additional detail, but the reference to RUS Bulletin 1730B-121 appears misaligned with the

vegetation management topic because that bulletin addresses wood pole inspection and maintenance rather than vegetation clearance standards.

Recommendation: Identify the specific vegetation clearance standards and rule references it relies on for its California facilities and should remove or clarify any standards citations that do not directly apply to vegetation management. The plan should also provide a short explanation of contractor oversight, including how the 10% audit is performed and how any vegetation-related deficiencies are tracked and resolved.

2.9 Infrastructure Inspections

Code requirement: PUC 8387(2)(I)
Location in the plan: Section 10; Appendix E

Infrastructure inspections are addressed in Section 10, Inspection & Contractor Oversight, and Appendix E, Inspection Program. Section 10 states that VEA performs detailed inspections every 3–5 years, uses technologies such as drones and infrared imaging where appropriate, and subjects contractor-performed inspections to quality assurance review. Appendix E adds that distribution and transmission poles receive detailed inspection every 10 years with annual patrols, that substations receive monthly detailed inspections, and that independent QA audits are performed on at least 10% of inspection work.

Taken together, these sections show that the WMP includes an inspection program and identifies the principal inspection methods, intervals, and oversight measures used by VEA. For a utility of VEA's size, this provides a reasonable basis for addressing the subject matter required by PUC 8387(2)(I).

The discussion remains somewhat general, however. The plan identifies several inspection types and methods, including patrols, detailed inspections, aerial/drone inspections, and infrared thermography, but does not clearly define those terms or distinguish them in operational detail. It also does not reconcile the difference between the 3–5 year detailed inspection interval in Section 10 and the 10-year detailed inspection interval for poles in Appendix E.

Recommendation: Define the inspection types referenced in the WMP, including patrols, detailed inspections, aerial/drone inspections, and infrared thermography, and clarify the applicable inspection intervals for its California facilities. The plan should also briefly describe how inspection findings are prioritized, assigned for correction, tracked, and closed.

2.10 List of Prioritized Wildfire Risks and Risk Drivers

Code requirement: PUC 8387(2)(J)
Location in the plan: Section 4; Appendix A

VEA's WMP addresses wildfire risks and risk drivers in Section 4 and Appendix A. Section 4 identifies the principal risk categories, while Appendix A provides the plan's risk prioritization.

Appendix A groups wildfire risks into several categories and applies a scoring method based on likelihood of ignition and consequence of ignition, each rated on a 1–5 scale. It also states that scoring reflects historical system performance, environmental exposure, asset population, and operating experience.

Appendix A further includes a prioritized risk list for Fish Lake Valley, California, assigning each listed risk a likelihood score, consequence score, overall risk score, priority level, and associated mitigation approach. The listed risks are assigned low overall priority scores, which is generally consistent with the WMP's broader characterization of VEA's California system as a small, rural service area with limited assets and relatively low wildfire exposure.

Taken together, Section 4 and Appendix A demonstrate that VEA has identified, described, and prioritized wildfire risks within its California service territory. On that basis, the WMP addresses the general subject matter required by PUC 8387(2)(J).

2.11 Risks and Risk Drivers Associated with Design, Construction, Operation and Maintenance

Code requirement: PUC 8387(2)(J)(i)
Location in the plan: Section 4; Appendix A

The WMP identifies several wildfire risk drivers associated with the design, construction, operation, and maintenance of VEA's electrical system. These include:

- vegetation contact,
- pole or hardware failure,
- aging poles and crossarms,
- conductor failure, and
- recloser or fuse malfunction.

The plan also identifies related mitigation measures such as covered conductors, recloser upgrades, vegetation management, inspections, and repair or replacement of equipment as needed.

For a small and limited California distribution system, this provides a reasonable basis for addressing the subject matter required by **PUC 8387(2)(J)(i)**. The WMP identifies the principal equipment- and operations-related risk drivers relevant to VEA's facilities and links those drivers to practical mitigation and maintenance measures.

The discussion would be more useful if it more directly explained how the identified risk drivers relate to VEA's system design, construction standards, operating practices, and maintenance activities. At present, the relevant issues are identified within the broader risk framework, but the plan does not always explain how each risk driver is connected to those areas of utility practice.

Additional explanation would also help show how certain mitigation measures relate to existing system conditions. For example, the WMP identifies measures such as covered

conductors, recloser upgrades, and updated design standards, but does not always indicate whether those measures reflect existing facilities, current programs, or potential future improvements.

Recommendation: Briefly explain how the identified equipment and operations-related risk drivers relate to VEA's system design, construction standards, operating practices, and maintenance activities.

2.12 Risks and Risk Drivers Associated with Topographic and Climatological Risk Factors

Code requirement: PUC 8387(2)(J)(ii)
Location in the plan: Section 4; Appendix A

Several topographic and climatological factors relevant to wildfire risk in its California service territory are identified in the Plan. These include high wind events, low humidity, extreme temperatures, drought conditions, and localized terrain and vegetation conditions. The plan also notes that the California service area is located in a rural high-desert basin with generally flat terrain, low vegetation density, and no facilities located within CPUC High Fire-Threat Districts.

Appendix A addresses these factors within the risk framework by identifying environmental risks and topographic/climatological risks, including high winds, drought conditions, fuel moisture, and terrain-related fire spread considerations. The prioritized risk list also includes items such as high winds in the valley and area topography, with both assigned low overall risk scores. In the context of VEA's small California footprint, this provides a reasonable basis for addressing the subject matter required by PUC 8387(2)(J)(ii).

Overall, the WMP provides a reasonable discussion of the topographic and climatological risk factors relevant to VEA's California operations and identifies the main environmental conditions that influence wildfire risk in the service territory.

2.13 Identification of Higher Threat Areas

Code requirement: PUC 8387(2)(K)
Location in the plan: Section 4; Appendix B

The Plan addresses the identification of higher wildfire threat areas through Section 4 and Appendix B. The plan states that VEA has no infrastructure identified as high fire risk within its California service territory and indicates that the California system is located outside the applicable CPUC High Fire-Threat District designations.

This conclusion is generally consistent with the service-area context described elsewhere in the WMP, including the system's flat basin terrain, low vegetation density, and limited California footprint. For a utility of VEA's size and service-area profile, which provides a reasonable basis for addressing the subject matter required by PUC 8387(2)(K).

Appendix B would benefit from more precise map terminology. The Appendix B header uses the term High Fire-Threat District, which refers to the CPUC utility fire-threat map, while the map legend uses FHSZ terminology, which refers to CAL FIRE "Fire Hazard Severity Zones." These are different mapping frameworks developed by different agencies for different purposes. The CPUC High Fire-Threat District map is used for utility wildfire safety regulation and identifies areas of elevated or extreme utility-associated wildfire threat, while Fire Hazard Severity Zones are CAL FIRE hazard classifications based on broader physical wildfire conditions.

Because these maps serve different purposes and use different terminology, accurate labeling is important. The appendix should make clear which map source is being used and should apply the correct map name consistently throughout.

Recommendation: Consider adding a brief note to Appendix B identifying the map source and clarifying the terminology used in the appendix. If both CPUC High Fire-Threat District mapping and CAL FIRE "Fire Hazard Severity Zone" information are referenced, a short explanation of the distinction between the two would help avoid confusion and support VEA's conclusion that no higher-threat areas have been identified in its California service territory.

2.14 Wildfire Risk Methodology

Code requirement: PUC 8387(2)(L)
Location in the plan: Appendix A

Appendix A sets out the methodology used to identify, evaluate, and prioritize wildfire risks within VEA's California service territory. The appendix organizes risks into several categories, including equipment and infrastructure, vegetation, environmental conditions, topographic and climatological factors, and critical infrastructure or community considerations.

The methodology uses a scoring approach based on likelihood of ignition and consequence of ignition, each rated on a 1–5 scale and combined to produce an overall risk score. Appendix A also identifies the factors considered in each category, including equipment age and condition, vegetation encroachment, weather exposure, historical ignition history, proximity to population and critical infrastructure, fire spread potential, and suppression difficulty.

The appendix further explains that the scoring reflects historical system performance, environmental exposure, asset population, and operational experience within the service territory. It also describes how the results are intended to inform mitigation prioritization, capital planning, and future plan updates. In addition, the appendix includes a specific example explaining the likelihood rating assigned to aging poles, which helps illustrate how the methodology is applied in practice.

For a utility of VEA's size, this is a reasonable and workable framework for evaluating wildfire risk. The methodology is straightforward and generally proportionate to the scale of the California system. Overall, the plan presents a wildfire risk methodology that is suitable for identifying and prioritizing wildfire risk within VEA's California service territory.

2.15 Service Restoration Process

Code requirement: PUC 8387(2)(M)
Location in the plan: Section 6.4

Section 6.4 provides a high-level statement of the service restoration process. It states that patrols are conducted prior to re-energization and that System Operators coordinate safe re-energization once conditions have been verified.

This discussion appears intended to relate most directly to the operating strategies described in Section 6, including the preceding discussion of reclosing and de-energization protocols. However, the text does not clearly state whether the restoration process applies specifically to planned de-energization, wildfire-related outages, or more routine protective device operations and fault events.

The section also leaves several practical questions unresolved that would normally help define a restoration process. For example, it does not indicate whether patrol is required following all de-energization events or only certain categories of outages. It also does not explain whether patrol is performed only to the apparent source of the outage or across the full affected line segment, or whether conditions such as high winds or Red Flag Warnings affect that determination.

Another consideration is VEA's reliance on upstream Southern California Edison infrastructure to serve its California system. While that dependency is described elsewhere in the WMP, Section 6.4 does not explain how upstream system conditions may affect restoration sequencing or re-energization decisions following an outage event.

Recommendation: Clarify the outage scenarios covered by the restoration process, including planned de-energization, wildfire-related outages, and protective device operations or fault events. Provide a brief explanation of patrol scope, re-energization decision criteria, and how upstream Southern California Edison conditions may affect restoration sequencing for the California service territory.

2.16 Monitor and Audit the Implementation of the WMP

Code requirement: PUC 8387(2)(N)(i)
Location in the plan: Section 5; Appendix C

Section 5 addresses monitoring and auditing of WMP implementation through the plan's listed performance metrics and evaluation activities. The section identifies measures such as utility-caused ignitions, vegetation miles cleared, inspection completion, equipment upgrades, and outage notifications. It also states that plan evaluation will include audits, corrective action plans, and integration of fire investigations into future plan revisions.

Most of the listed measures are best understood as **program implementation or work-completion metrics**, rather than lagging measures of wildfire mitigation performance.

Vegetation miles cleared, inspections completed, equipment upgrades installed, and outage notifications primarily show whether planned activities were completed. Utility-caused ignitions is the metric most directly tied to wildfire mitigation outcomes.

Appendix C provides additional support by stating that, following major fire events, VEA and BLM will conduct a joint after-action review to evaluate coordination, notification, and investigation processes, with corrective actions incorporated into the next WMP update.

For a utility of VEA's size, these provisions provide a reasonable foundation for monitoring WMP implementation. The plan identifies both routine tracking of program activities and event-based review following major incidents.

The discussion remains general and does not explain how implementation monitoring is organized, who reviews results, or how often progress is assessed outside of major events and plan updates. A more direct description of the review process would better show how VEA oversees WMP implementation over time.

Recommendation: Describe the process used to monitor WMP implementation, including responsible personnel or departments, review frequency, and how implementation results are documented. Distinguish between work-completion measures and outcome-based metrics so the plan more clearly shows how VEA tracks both program execution and wildfire mitigation performance.

2.17 Identify Deficiencies in the WMP

Code requirement: PUC 8387(2)(N)(ii)
Location in the plan: Not clearly addressed

The WMP does not appear to describe a specific process for identifying deficiencies in the plan itself. Section 5 states that plan evaluation will include audits, corrective action plans, and integration of fire investigations into future plan revisions. Appendix C also states that after major fire events, VEA and BLM will conduct a joint after-action review, with corrective actions incorporated into the next WMP update.

These provisions suggest that operational issues may be identified through audits, investigations, and post-event review. However, the plan does not describe a defined ongoing process for identifying deficiencies in the WMP or its implementation outside of those general review mechanisms.

Absent a major fire event, the WMP does not describe a clear mechanism for identifying plan deficiencies and feeding them into plan improvement. The clearest improvement process described in the plan is event-driven, rather than a standing periodic review process.

Recommendation: Describe a standing process for identifying, documenting, evaluating, and correcting deficiencies in the WMP and its implementation. Include who is responsible for

reviewing deficiencies, how corrective actions are tracked, and how identified issues are incorporated into future WMP updates.

2.18 Monitor and Audit the Effectiveness of Inspections

Code requirement: PUC 8387(2)(N)(iii)
Location in the plan: Section 10; Appendix E

The WMP addresses monitoring and auditing of inspection effectiveness in **Section 10, Inspection & Contractor Oversight**, and **Appendix E, Inspection Program**. Section 10 states that contractor-performed inspections are subject to quality assurance review, and Appendix E states that independent QA audits are performed on at least **10%** of inspection work. Appendix E also provides that identified deficiencies are tracked in VEA's asset management system until resolved.

These provisions provide a reasonable basis for demonstrating that inspection work is subject to follow-up review and audit. The plan shows that VEA does not rely solely on inspection completion but also includes a process for reviewing contractor work and tracking identified deficiencies.

The discussion remains fairly limited in describing how inspection effectiveness is evaluated beyond QA review and deficiency tracking. The plan does not explain what criteria are used to assess inspection quality, how audit results are reviewed, whether audit findings are trended over time, or how VEA determines whether the inspection program is effectively identifying wildfire-related conditions.

Recommendation: Describe how inspection effectiveness is evaluated, including the criteria used for QA review, how audit results are reviewed, and how recurring inspection findings or contractor performance issues are addressed. Explain how identified deficiencies are prioritized, tracked, and verified as complete

2.19 Public Comments

Code requirement: PUC 8387(3)
Location in the plan: Section 11

Public comment and public meeting requirements are discussed in Section 11, Public Engagement. That section states that the plan will be presented at a noticed VEA Board of Directors meeting, that a public comment period will be provided with responses documented, and that VEA will coordinate with local agencies, town boards, and emergency services.

The section identifies the main elements expected under this requirement, including public presentation, opportunity for comment, and coordination with relevant local entities.

2.20 Independent Evaluation

Code requirement: PUC 8387(3)(c)
Location in the plan: Section 12; Appendix G

The WMP addresses independent evaluation in Section 12 and Appendix G. The plan states that VEA will retain a qualified independent evaluator to review the WMP, issue a written report, and present that report at a public board meeting. It also provides that the report will be posted on VEA's website.

Appendix G adds that the evaluator should have experience in electrical system operations, wildfire mitigation strategies, and utility safety performance assessment. It also outlines the reporting timeline, including issuance of the report following plan filing and presentation at a noticed board meeting.

3. Conclusion

Valley Electric Association's Wildfire Mitigation Plan generally addresses the elements required by **California Public Utilities Code § 8387** and reflects the limited scale and relatively low wildfire exposure of VEA's California service territory. The plan identifies the principal wildfire risks within the service area, describes mitigation, inspection, vegetation management, operating, notification, restoration, and coordination measures, and provides a basic framework for monitoring and independent evaluation.

For a small California electric cooperative with a limited distribution footprint, the WMP provides a reasonable foundation for wildfire mitigation planning. Most required elements are addressed at a level generally proportionate to the size and risk profile of VEA's California operations. However, the plan does not clearly describe a standing process for identifying and correcting deficiencies in the WMP or its implementation, as contemplated by **PUC 8387(2)(N)(ii)**.

The recommendations identified in this evaluation are intended to improve the plan's clarity, consistency, and implementation detail. These recommendations primarily relate to vegetation management standards, inspection program detail, risk-table presentation, map terminology, service restoration procedures, implementation monitoring, WMP deficiency identification, and inspection-effectiveness review.

Overall, the WMP presents a workable approach to wildfire mitigation for VEA's California service territory, but the deficiency-identification process should be more directly addressed. With that addition and the targeted refinements identified in this report, the plan would provide a more complete and transparent description of VEA's wildfire mitigation framework.