

2026 Wildfire Mitigation Plan

Independent Evaluation Report

Prepared for:

Truckee Donner Public Utilities Department



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Disclaimer

California Public Utilities Code (PUC) 8387 mandates that local publicly owned electric utilities (POUs) shall prepare a Wildfire Mitigation Plan (WMP or Plan) on a periodic basis. Additionally, POUs are required to engage a qualified independent evaluator (IE) with experience to assess the comprehensiveness of its WMP.

Truckee Donner Public Utilities District (TDPUD) requested L J Manz Consulting to conduct a review and provide an Independent Evaluation report of their 2026 WMP to ensure it meets the most recent requirements of PUC § 8387. This review is based on TDPUD's 2026 WMP and evaluates the comprehensiveness of the presented Plan.

The information provided in this report represents L J Manz Consulting's analysis based on the information available at the time the review was conducted. L J Manz Consulting is not responsible for the success or failure of TDPUD's projects nor any potential ignition resulting therefrom. L J Manz Consulting makes no representations or warranties expressed or implied regarding the reliability or thoroughness of TDPUD's 2026 WMP. Recipients of the Independent Evaluation report assume all liabilities incurred by themselves, or third parties, resulting from their reliance on the report, or the data, information, and/or assessment contained therein.

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Overview

California Public Utilities Code (PUC) § 8387 (a) requires that publicly owned electric utilities construct, maintain, and operate electrical lines and equipment in a manner that minimizes the risk of wildfire posed by those electrical lines and equipment.¹ PUC § 8387(b) requires publicly owned electric utilities to prepare and submit a wildfire mitigation plan (WMP) to the California Wildfire Safety Advisory Board (WSAB) on a predetermined schedule.² The Plan must contain required information in accordance with PUC § 8387(2). PUC § 8387(3)(c) requires a POU to contract a qualified independent evaluator (IE) with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The IE prepares a report that is made available on the website and presents the report at a public meeting of the local publicly owned electric utility governing board.

The Truckee Donner Public Utility District (TDPUD) is a special district of the State of California engaged in the distribution, sale, and delivery of electric power and water. Located high on the eastern slope of the Sierra Nevada, TDPUD is a transmission-dependent utility connected to NV Energy's transmission system. TDPUD is not directly interconnected with the California transmission system nor to any California utility in a meaningful way. TDPUD provides retail electric service to nearly 15,000 customers with a significant transient population based on second homeowners and destination tourism.

TDPUD's electric service territory comprises approximately 44 square miles in eastern Nevada County and approximately 1.5 square miles in Placer County. The 225-mile electric system includes approximately 135 miles of 12.47 kilovolt (kV) and 14.4 kV overhead distribution lines, and about 0.5 miles of 60 kV overhead transmission lines. TDPUD approximates 5,550 poles in its service territory.

The WMP is refreshed as part of an annual review process that describes activities and strategies undertaken by TDPUD to mitigate the threat of electric utility ignited wildfires. The various programs and procedures address unique features of TDPUD's service area including topography, weather, infrastructure, grid configuration, and wildfire risk potential.

The Plan is subject to approval by TDPUD's Board of Directors and is implemented under the direction and oversight of the General Manager.

To comply with PUC § 8387(c) that the local publicly owned electric utility 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,

¹ California Public Utilities Code section 8387.

² <https://energysafety.ca.gov/wp-content/uploads/2025/12/schedule-for-pou-and-co-op-wmp-submissions-working-version-approved-dec-2025.pdf>

TDPUD engaged L J Manz Consulting as an IE to assess the comprehensiveness of the plan against the applicable regulations.

This evaluation is based on industry standard practices and experience developing and evaluating WMPs. The topics specifically addressed originate from California's PUC Section 8387(b)(2) relevant to the specific sections of TDPUD's WMP.

Table 1. Wildfire Mitigation Plan Requirements

Requirement	Statute
Responsible Persons	PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the WMP.
Plan Objectives	PUC § 8387(b)(2)(B): The objectives of the WMP.
Preventive Strategies and Programs	PUC § 8387(b)(2)(C): A description of the preventive strategies and programs to be adopted by the local POU to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.
Plan Metrics	PUC § 8387(b)(2)(D): A description of the metrics the local POU plans to use to measure and track the implementation of the WMP and the assumptions that underlie the use of those metrics.
Impact of Metrics	PUC § 8387(b)(2)(E): A discussion of how the application of previously identified metrics to previous WMP performances has informed this WMP.
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, and protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.

Requirement	Statute
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 direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential deenergization for a given event.
Vegetation Management	PUC § 8387(b)(2)(H): Plans for vegetation management.
Patrols and Inspections	PUC § 8387(b)(2)(I): Plans for inspections of the POU's electrical infrastructure.
Wildfire Risk Prioritization	PUC § 8387(b)(2)(J): A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the POU's service territory. The list shall include, but not be limited to, both of the following: i. Risks and risk drivers associated with design, construction, operation, and maintenance of the POU's equipment and facilities. ii. Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the POU's service territory.
Wildfire Threat Map	PUC § 8387(b)(2)(K): Identification of any geographic area in the POU service territory that is a higher wildfire threat that 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.
Enterprise Safety Risk	PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk.
Restoration of Service	PUC § 8387(b)(2)(M): A statement of how the POU will restore service after a wildfire.

Requirement	Statute
Monitor and Audit	PUC § 8387(b)(2)(N): A description of the processes and procedures the POU shall use to do all the following: i. Monitor and audit the implementation of the WMP. ii. Identify any deficiencies in the WMP or its implementation, and correct those deficiencies. iii. Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the WMP, other applicable statutes, or commission rules.

Plan Evaluation

TDPUD's multi-layered wildfire mitigation strategy integrates prevention, detection, and protection to identify and ignitions. A high level of rigor is set from the beginning by using a Tier 3 wildfire standard across the territory to effectuate the maximum level of protection. TDPUD is a transmission-dependent utility that coordinates with NV Energy as its transmission provider. This assessment shows how TDPUD comprehensively addresses the requirements of PUC § 8387(b)(2).

PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the WMP.
Section 3; p 15-16

TDPUD's Plan implementation is reflected in the duties of:

- General Manager, who provides overall direction and management as the ultimate responsible entity for the Plan.
- Public Information Officer, as the public liaison who is responsible for public awareness, including customers and external agencies.
- Director of Electric Engineering and Operations who has overall functional management of the electric utility and day-to-day oversight of the Plan. Functionally, the Electric Operations Manager and Electric Engineering Manager provide additional levels of oversight and implementation of Plan initiatives.
- The Chief Financial Officer who oversees customer service, the call center, and dispatch.
- The Director of Human Resources and Risk Management who provides oversight for the development of the TDPUD's Emergency Operations Plan (EOP).

This structure and approach are aligned with other similarly situated small public utilities.

The Plan's overarching objectives focus on actions that enhance reliability and safety while also reducing the likelihood and consequence of a utility-caused wildfire. This is achieved through a combination of prevention measures and detection methods. Actions in the Plan focus on protecting customers and the general public from utility-caused wildfires. The projects, programs, and initiatives presented in the Plan align with safety, prevention, mitigation, and recovery outcomes informed by California laws.

PUC § 8387(b)(2)(C): A description of the preventive strategies and programs to be adopted by the local POU to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.

Section 5, p 22-31

The strategies and programs use a portfolio approach to assure both proactive and responsive measures that are consistent with minimizing the risk of utility-caused catastrophic wildfires. The initiatives consider the level of risk and near-term programs; the Plan also considers further out climate change risks. Risk drivers and mitigation measures relate to design and construction, vegetation management, inspections and corrections, operations, maintenance, and workforce training in the TDPUD service territory.

Weather monitoring, enhanced by CloudFire and Gridware technologies, supports risk intelligence to prioritize actions and initiatives. Design and construction standards using a "heavy loading" designation to withstand weather events. Targeted hardening and resilience initiatives as part of a focused system hardening approach. Advanced metering and integrated communications and data management systems that support situational awareness, remote operations, and advanced analytics. Vegetation management is suited to TDPUD's high-mountain environment. Enhanced inspections and corrections, using select targeted patrols, to identify and remedy potential safety hazards and manage overall system integrity. Ruggedization measures include expulsion fuse replacement where feasible, pole replacements in the highest fire threat areas. Focused workforce training programs to minimize the likelihood of a personnel-caused wildfire. Multi-setting recloser operations that can be adapted to risk conditions. Pre-emptive deenergization that is coordinated with the water utility, NV Energy, and partner agencies, using a structured and consistent approach. Emergency management includes guidance from Government Code Section 8607.

PUC § 8387(b)(2)(D): A description of the metrics the local POU plans to use to measure and track the implementation of the WMP and the assumptions that underlie the use of those metrics.

Section 8, p 39-42

Actionable measures enhance the reliability and safety of TDPUD's electric distribution system while reducing the likelihood that TDPUD's infrastructure contributes to wildfire ignition. There are five metrics areas in the Plan: fire ignitions, outage causes, vegetation management, red flag warnings, and reliability. TDPUD participates in industry forums to gather information about prevailing industry practices. The organization uses this and other information to adjust to preferred practices to lower the risk profile over time.

PUC § 8387(b)(2)(E): A discussion of how the application of previously identified metrics to previous WMP performances has informed this WMP. *Section 8, p 42*

TDPUD undertakes an annual assessment of its WMP to gauge the effectiveness and usefulness of each performance metric. As the industry matures, metrics are adjusted to provide meaningful insight into the wildfire risk and effectiveness of mitigation efforts.

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, and protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure. *Section 5, p 29-30*

TDPUD uses an adaptive approach to recloser settings to reduce fault intensity and duration. Automatic circuit reclosers are placed into no-reclose mode based on fire weather conditions. TDPUD is also implementing an Advanced Power Safety Settings program for faster tripping during extreme wildfire conditions. This is aligned with wildfire mitigation practices in the region.

Deenergization can be driven by connected systems, such as NV Energy, or by TDPUD should extreme conditions warrant. Direct contact with critical agencies and emergency responders communicates known preemptive shutoff announcements.

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 direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential deenergization for a given event. *Section 5, p 31-32*

Customer notification protocols include direct contact with critical agencies and emergency responders until contact and message receipt are confirmed. As a transmission-dependent utility, these notifications apply to deenergization initiated by TDPUD or interconnected utilities. The broader set of customers can sign up for individual alerts through the customer engagement tool. Non-customers can sign up for Nixle alerts for major outages and proactive deenergization alerts. TDPUD uses a variety of notification methods including media, social media, website, text, and email. An online outage map is provided for more information. Communications are bolstered by TDPUD's awareness and preparedness efforts across the community.

PUC § 8387(b)(2)(H): Plans for vegetation management. *Section 5, p 27-28*

TDPUD addresses vegetation management in Section 5.D and Appendix C describing how vegetation management is conducted and how clearances are met or exceeded. A five-year trimming cycle is supplemented by 20-foot rights of way around utility poles. Standing dead trees are identified and removal plan developed for potential strike trees within 200 feet of high-voltage wires. Dead vegetation and trees that threaten infrastructure are addressed on an as-needed basis. Customer calls are logged for information related to tree hazards. Vegetation management requirements are also guided by California Public Resources Code Sections 4292 and 4293 requirements, GO 95 Rule 35 and its related Appendix E. Inspection records are stored in GIS to conduct vegetation management cycles and routes, prioritizing the most critical areas.

PUC § 8387(b)(2)(I): Plans for inspections of the POU's electrical infrastructure. Section 5, p 28-29

Inspections and corrections are informed by GO 165 and GO 95. TDPUD conducts comprehensive detailed inspections of its overhead electric system annually, exceeding the minimum requirements. Targeted patrols supplement the inspections as needed to identify and prioritize corrections, broader improvements and enhancements, or replacement. Targeted supplemental patrols are used to identify emerging risks to mitigate potential wildfire hazards.

PUC § 8387(b)(2)(J): A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the POU's service territory. The list shall include, but not be limited to, both of the following: Section 4, p 19-20

- i. Risks and risk drivers associated with design, construction, operation, and maintenance of the POU's equipment and facilities.*
- ii. Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the POU's service territory.*

TDPUD uses many tools to assess, categorize, and prioritize wildfire risks. In addition to the CPUC Fire Threat Map, which designates High Fire Threat Districts (HTFDs) across California, CloudFire provides fire weather information on both a planning and operating basis. More recently the installation of Gridware equipment supports near-real time awareness. With these informational tools to assess risk, TDPUD creates a portfolio to address identified wildfire risks. Other risks and risk drivers include:

Design and Construction – using ruggedization and hardening for assets in the most vulnerable areas. In California GO 95 also provides guidance as to the construction of electric utility facilities in the state.

Operations – taking into account potential weather impacts and equipment conditions and features, adapting operational modes to protect public safety. This may include proactive deenergization under extreme circumstances.

Maintenance – as part of an overall inspections and corrections program, in line with California's GO 165 requirements.

Per the requirements, TDPUD also assesses climatological impacts on a farther out basis using a variety of sources. Historically a 2.0°F warming trend has resulted in projections of higher temperatures and lower precipitation, including impacts to snowfall, over the subsequent decades.

PUC § 8387(b)(2)(K): Identification of any geographic area in the POU service territory that is a higher wildfire threat that 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. Appendix A

The CPUC's High Fire Threat District Map for the utility system is consistent with TDPUD's identification of wildfire threat in its service territory.

PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk. *Section 4, p 20*

Enterprisewide safety risk and related wildfire risk are assessed through a formal risk assessment approach to evaluate a range of safety-related risks. The assessment includes potential threats to core business functions or business continuity. An external expert is engaged to supplement TDPUD's assessment.

PUC § 8387(b)(2)(M): A statement of how the POU will restore service after a wildfire. *Section 7, p 33-34*

TDPUD conducts patrols along de-energized portions of the system. Service restoration is based on an inspection that determines the system is safe to re-energize. Because deenergization may be driven by a number of factors, including power interruption initiated by NV Energy, the system is actively monitored by personnel and systems that include SCADA, AMI, OMS and Gridware, for safe and coordinated restoration.

PUC § 8387(b)(2)(N): A description of the processes and procedures the POU shall use to do all the following: *Section 8, p 34-38*

- i. Monitor and audit the implementation of the WMP.*
- ii. Identify any deficiencies in the WMP or its implementation, and correct those deficiencies*
- iii. Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the WMP, other applicable statutes, or commission rules.*

The Plan is presented to the Board annually and is evaluated throughout the year with semi-annual updates to the General Manager. Plan metrics help leadership assess progress against program goals and targets to identify deficiencies. Ongoing electrical line and equipment inspections are guided by GO 165 (inspections) and GO 95 (construction) for alignment with respective requirements.

Conclusion

TDPUD's primary goal is to construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of wildfire posed by those electrical lines and equipment, and ensure compliance with California PUC § 8387. Following an independent evaluation of TDPUD's 2026 WMP, L J Manz Consulting concludes that TDPUD's WMP includes the required elements of PUC § 8387 and is comprehensive according to the requirements.