



CITY OF REDDING

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cityofredding.gov

## **Redding City Council Regular Meeting August 18, 2026 Action Agenda**

### **2. PRESENTATION**

**2A. *This item was removed from the agenda at the request of Caltrans.***

Presentation by Caltrans District 2 Project Manager Javed Iqbal regarding the Downtown Redding CAPM project.

### **4. CONSENT CALENDAR**

4(a). Approve City Council Minutes: Special Meeting – Closed Session of August 4, 2026; and Regular Meeting of August 4, 2026.

4(b). Accept City of Redding Accounts Payable Register No. 12; and Payroll Register Nos. 25 and 26.

4.5(a). Approve the following actions related to Bid Schedule No. 5694 for the procurement of underground vault structures, lids, pads, and cover assemblies:

- (1) Authorize Redding Electric Utility to procure underground vault structures, lids, pads, and cover assemblies from Oldcastle Infrastructure as the primary vendor, Jensen Precast as a backup vendor, and Madruga Ironworks as a specialty vendor, on a per-quote basis without soliciting multiple quotes;
- (2) Authorize total expenditures for these purchases not to exceed \$1,200,000 per fiscal year for a period not-to-exceed two fiscal years, beginning in Fiscal Year 2026-27 and ending at the close of Fiscal Year 2027-28; and
- (3) Authorize the City Manager, or designee, to approve additional expenditures of up to \$150,000 per fiscal year to address unforeseen cost increases associated with material, labor, or operational requirements.

4.5(b). Authorize and approve the following relative to Bid Schedule No. 5704 for furnishing electric utility trench and excavation work:

- (1) Award to Chavez General Engineering Construction Inc., at the bid unit prices, for a total amount of \$1,040,610.00;
- (2) Authorize the City Manager, or designee, to approve contingency funding in the amount of \$210,000, representing 20 percent of the evaluated contract amount;
- (3) Authorize the City Manager, or designee, to extend the contract for up to two additional one-year periods, if mutually agreeable, with all prices, terms, and conditions remaining the same; and
- (4) Find that the activity is categorically exempt from environmental review under the California Environmental Quality Act; pursuant to Section 15301 – Existing Facilities, Section 15302 – Replacement or Reconstruction, and Section 15303 – New Construction or Conversion of Small Structures.

4.8(a). Approve and authorize the following for the City of Redding Fire Department:

- (1) Approve an increase to the previously approved purchase of Self-Contained Breathing Apparatus (SCBA) equipment to include Rapid Intervention Team (RIT) packs in the amount of \$54,787.61;
- (2) Adopt **Resolution No. 2026-070** approving and adopting the 50<sup>th</sup> Amendment to City Budget Resolution No. 2025-049 appropriating \$0;
- (3) authorize the use of Buckeye Fire Protection District funds for the additional equipment;
- (4) Approve an amendment to the previously authorized standardization and sole-source of SCBA products and associated equipment to 3M Scott to include RIT packs; and
- (5) Authorize the Purchasing Officer, or designee, to amend Purchase Order PUR003689, increasing the amount by \$54,787.61, for a total not-to-exceed amount of \$1,021,065.84.

4.11(a). Authorize and approve the following actions relative to the City of Redding Tarmac Road Storm Drain Emergency Replacement Project (Project):

- (1) Accept update regarding the Project; and
- (2) Pursuant to Public Contract Code Section 22050(c)(1), make a determination by a four-fifths vote that there is a need to continue the emergency work.

4.11(b). Authorize and approve the following actions relative to the Butte Street Boogie Network Project:

- (1) Adopt the Mitigated Negative Declaration, and the Mitigation Monitoring and Environmental Commitment Program; and
- (2) Approve the Butte Street Boogie Network Project as described, thereby satisfying the requirements of the California Environmental Quality Act Guidelines §15074.

4.11(c). Authorize the following actions relative to Request for Proposal (RFP) No. 5680, for water storage tank repair and maintenance services:

- (1) Award to Superior Tank Solutions, Inc.;
- (2) Authorize the Mayor to execute a Consultant and Professional Services Contract with Superior Tank Solutions, Inc. for water storage tank repair and maintenance services for an approximately ten-year period and for a not to exceed fee of \$12,201,000;
- (3) Authorize the City Manager, or designee, to approve contract amendments not-to-exceed \$200,000;
- (4) Adopt **Resolution No. 2026-071** approving and adopting the 49<sup>th</sup> Amendment to City Budget Resolution No. 2025-049 appropriating \$915,080 for Fiscal Year 2026-27; and
- (5) Find that the water storage tank repair and maintenance program is categorically exempt from review under the California Environmental Quality Act, pursuant to Section 15301 - Existing Facilities.

4.11(d). Authorize and approve the following actions relative to Bid Schedule No. 5713 (Project No. STADM23030), Replace Asphalt Concrete Surfacing 2026:

- (1) Award to Tullis, Inc. in the amount of \$1,882,564.00;
- (2) Approve \$359,350 to cover the cost of administration and inspection fees;
- (3) Approve \$254,130 for project development costs;
- (4) Approve \$225,000 to provide construction contingency funding;
- (5) Authorize the City Manager, or designee, to approve additional increases in either the construction management or construction contingency amounts up to a total of \$50,000;
- (6) Approve the project design plans, specifications, and special provisions; and
- (7) Find that the project is categorically exempt from review under the California Environmental Quality Act Guidelines, pursuant to Section 15301(c) – Existing Facilities.

4.11(e). Authorize and approve the following actions relative to the ongoing Transportation Grant Projects:

- (1) Increase the Turtle Bay to Downtown Gap Completion Project (“TBTDT” Project) budget by \$232,560 using Fiscal Year (FY) 2025-26 Streets Capital appropriations; and
- (2) Increase the Victor and Cypress Avenues Active Transportation Project (“VCAT” Project) budget by \$78,450 using FY 2026-27 Streets Capital appropriations.

4.11(f). Authorize and approve the following actions relative to Bid Schedule No. 5690, Caldwell Park Expansion Project:

- (1) Award the project to the lowest bidder, S.T. Rhoades Construction, Inc., in the amount of \$4,372,117.50;
- (2) Approve an additional \$269,675 to cover the cost of administration and inspection fees;
- (3) Approve \$619,000 for project development costs;
- (4) Approve \$437,000 to provide construction contingency funding; and
- (5) Authorize the City Manager, or designee, to approve additional increases in either the construction management or construction contingency amounts up to a total of \$80,000.

**ACTION: All items on the Consent Calendar were either accepted, acknowledged, adopted, approved, ratified, and/or authorized.**

## 6. PUBLIC HEARINGS

6.1. Adoption of a Resolution to adjust the City's Schedule of Fees and Service Charges.

**ACTION: The City Council adopted Resolution No. 2026-072 to adjust the City's Schedule of Fees and Service Charges (Schedule) with the following updates: (a) removal of adding a CPI escalator to the Tobacco Retail License (TRL); (b) removal of the Development Services Consultation Fee until a policy is brought back for Council's consideration; (c) removal of the Airport Public Parking Non-Payment Violations; (2) Add “Commercial” and “in restricted areas” to the description of “Filming and Still Photography” related to the Redding Airports; and (3) Clerical error clean up to: (a) remove the \$15.00 Airport parking violation fee; and (b) adjust misalignment of page fee amounts in the Development Services section of the Schedule (pages 3-8).**

**9. REGULAR CALENDAR: REPORTS & COMMUNICATIONS OF DEPARTMENTS, BOARDS, COMMISSIONS AND COMMITTEES**

**9.5(c). Approval of Redding Electric Utility's 2026 Wildfire Mitigation Plan.**

**ACTION: The City Council: (1) approved REU's updated and revised 2026 Wildfire Mitigation Plan pursuant to California Senate Bill 901; (2) accepted the 2026 Independent Evaluator's Report prepared by qualified independent evaluator Dudek pursuant to California Public Utilities Code Section 8387(c); and (3) found that this activity is exempt from review under the California Environmental Quality Act, pursuant to Section 15061(b)(3) – Common Sense Exemption.**

**9.11(g). *This item was removed from the agenda at the request of City of Redding staff.***

Updated project cost for the City of Redding Organics Diversion to Energy Operations project.

**9.11(h). Report providing an update for the City of Redding (City) Pump Station 1 Replacement Project.**

**ACTION: The City Council accepted an update regarding the City's Water Utility Pump Station 1 Replacement Project located along the Sacramento River.**

**9.14(a). First Amendment to Contract with Burke, Williams & Sorensen, LLP to provide legal services as Interim City Attorney.**

**ACTION: The City Council: (1) adopted Resolution No. 2026-073 approving and adopting the 51<sup>st</sup> Amendment to City Budget Resolution No. 2025-049 appropriating \$425,010; and (2) approved the First Amendment to the contract (C-11231) with Burke, Williams & Sorensen, LLP, in a not-to-exceed amount of \$1,220,000, for the provision of legal services as Interim City Attorney for the City of Redding, effective upon signing.**

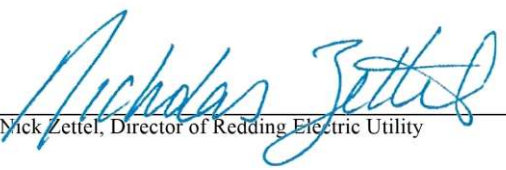
**12. SUGGESTIONS FROM COUNCIL MEMBERS RELATIVE TO POTENTIAL TOPICS FOR FUTURE CITY COUNCIL MEETINGS**

**In response to Vice Mayor Dr. Paul Dhanuka, Interim City Manager Webb confirmed that a report providing information and options available to assist with management of state parolee releases within the City of Redding will be forthcoming for Council's consideration at a future meeting.**

**13. ADJOURNMENT**



## CITY OF REDDING REPORT TO THE CITY COUNCIL

|                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>MEETING DATE:</b> August 18, 2026<br><b>ITEM NO.</b> 9.5(c)                                                                                                                                                                                  | <b>FROM:</b> Nick Zettel, Director of Redding Electric Utility                                                                                                                                                                                       |
| <b>***APPROVED BY***</b>                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                      |
| <br><small>Nick Zettel, Director of Redding Electric Utility      8/5/2026</small><br><a href="mailto:nzettel@cityofredding.org">nzettel@cityofredding.org</a> | <br><small>Michael Webb, Interim City Manager/Public Works Director      8/11/2026</small><br><a href="mailto:mwebb@cityofredding.org">mwebb@cityofredding.org</a> |
| <b>SUBJECT:</b> 9.5(c)--Consider Approval of Redding Electric Utility's 2026 Wildfire Mitigation Plan                                                                                                                                           |                                                                                                                                                                                                                                                      |

### ***Recommendation***

Authorize and approve the following actions regarding Redding Electric Utility's (REU) 2026 Wildfire Mitigation Plan:

- (1) Approve REU's updated and revised 2026 Wildfire Mitigation Plan pursuant to California Senate Bill 901;
- (2) Accept the 2026 Independent Evaluator's Report prepared by qualified independent evaluator Dudek pursuant to California Public Utilities Code Section 8387(c); and
- (3) Find that this activity is exempt from review under the California Environmental Quality Act, pursuant to Section 15061(b)(3) – Common Sense Exemption.

### ***Fiscal Impact***

There is no fiscal impact associated with this item. The requested actions approve revisions to Redding Electric Utility's (REU) 2026 Wildfire Mitigation Plan and accept the 2026 Independent Evaluator's Report; they do not authorize new expenditures, budget amendments, contracts, staffing changes, or capital commitments. The activities and level of service outlined in the 2026 Wildfire Mitigation Plan are already incorporated in REU's adopted biennial budget. Should future plan implementation require additional fiscal resources beyond those already approved, staff will return to council with a separate report for consideration.

### ***Alternative Action***

Council may reject staff's recommendation and provide alternative direction.

### ***Background/Analysis***

California Senate Bill 901 became law in September 2018 and requires electric utilities with overhead electrical infrastructure in high fire threat zones to prepare plans and implement wildfire mitigation efforts. California Public Utilities Code Section 8387(b)(2) establishes the requirements for local publicly owned electric utilities, and Section 8387(c) requires a qualified independent evaluator to review each plan and present the findings to the electric utility's governing board.

REU's first Wildfire Mitigation Plan program was approved by City Council on May 7, 2019; three additional programs were approved on December 3, 2019. City Council has approved annual updates each subsequent year, most recently on May 20, 2025. In 2026, revised submittal requirements shifted from annual filing to once every two years under a staggered Wildfire Safety Advisory Board schedule.

REU's 2026 Wildfire Mitigation Plan is due to the Wildfire Safety Advisory Board by October 2, 2026, and the next required submittal will occur in 2028. The plan organizes 11 programs across governance, risk intelligence, operational risk reduction, capital risk reduction, and customer and community resilience. It also adds an Operational Decision Support program and enhances the Public Safety Power Shutoff framework.

In 2025, REU achieved its strongest wildfire mitigation outcomes in the five-year reporting period. Utility-attributed wildfire ignitions fell to one, an 89 percent reduction from nine in 2021. Vegetation inspections achieved 100 percent coverage across transmission and distribution systems, staff trimmed 8,602 trees, completed all pole base clearance by May, treated 512 acres, and reduced priority-one vegetation defects from 286 to 163.

As required by Public Utilities Code 8387, REU engaged Dudek to conduct an independent evaluation of the plan. Dudek concluded that the plan is comprehensive, addresses each required Public Utilities Code Section 8387 element, reflects an appropriate understanding of wildfire risk in REU's service territory, and demonstrated a proactive, risk-informed approach to wildfire prevention, operational readiness, and system resiliency. Following City Council approval, staff will submit the plan by the required deadline.

### ***Environmental Review***

Staff has reviewed the action and determined that it is exempt from review under the California Environmental Quality Act (CEQA) pursuant to Section 15061(b)(3) – Common Sense Exemption. CEQA applies only to actions which have the potential for causing a significant effect on the environment. The action has been reviewed and it can be seen with certainty that there is no possibility that the activity may have a significant effect on the environment; therefore, the activity is not subject to CEQA.

***Council Priority/City Manager Goals***

- **Public Safety** – “Work to improve all aspects of public safety to help people feel secure and safe where they live, work, and play in the City of Redding.”
- **Government of the 21st Century** – “Be relevant and proactive to the opportunities and challenges of today’s residents and workforce. Anticipate the future to make better decisions today.”

***Attachments***

2026 Independent Evaluator’s Report  
REU 2026 Wildfire Mitigation Plan  
NOE Wildfire Mitigation Plan Update

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Independent Evaluator's Report

# Redding Electric Utility 2026-2029 Wildfire Mitigation Plan

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JULY 2026

*Prepared for:*

**REDDING ELECTRIC UTILITY**

3611 Avtech Parkway  
Redding, CA 96002  
*Contact: Nathan Aronson*

*Prepared by:*

**DUDEK**

687 S. Coast Highway 101, Suite 110  
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# Acronyms and Abbreviations

| Acronym/Abbreviation | Definition                             |
|----------------------|----------------------------------------|
| REU                  | Redding Electric Utility               |
| WUI                  | Wildland Urban Interface               |
| WSAB                 | Wildfire Safety Advisory Board         |
| OEIS                 | Office of Energy Infrastructure Safety |
| CPUC                 | California Public Utility Code         |
| WMP                  | Wildfire Mitigation Plan               |
| PG&E                 | Pacific Gas & Electric                 |

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# 1 Introduction

Publicly owned electric utilities and electric cooperatives in California are required to construct, maintain, and operate their electrical equipment in a manner that minimizes the wildfire risk posed by this equipment. This requirement includes preparing a Wildfire Mitigation Plan (WMP) that documents the utility's understanding of wildfire risk and risk drivers in its service territory, as well as the wildfire risk-reduction strategies it uses to mitigate these risks. Publicly owned electric utilities and electric cooperatives are further required to have their WMP evaluated by a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure.

Dudek's fire prevention team worked with the Redding Electric Utility (REU) to review their current WMP, evaluate their ongoing and new wildfire mitigation strategies, and prepare this Independent Evaluator's report for the Redding Electric Utility's 2026-2029 WMP.

## 1.1 Scope and Intent

Dudek worked with REU to prepare this Independent Evaluator's report to satisfy the requirements of Public Utilities Code (PUC) 8387(iii) (c). This Independent Evaluator's report is specific to the 2026-2029 REU Wildfire Mitigation Plan. It contains a review of the elements within WMP as well as the results of our review of data provided by the REU and from publicly available data sources regarding wildfire risk in REU's service territory and REU's wildfire risk reduction strategies. Dudek's review of the REU WMP assessed the following elements:

- i. Regulatory Requirements
- ii. REU's understanding of the wildfire risk and risk drivers in its service territory
- iii. REU's wildfire mitigation strategies

This independent Evaluator's report intends to satisfy the requirements of the PUC and provide REU with an assessment of the comprehensiveness of its WMP. Recent guidance from the California Wildfire Safety Advisory Board (WSAB) indicated that its current focus areas are risk identification and preemptive de-energization (WSAB 2025). Therefore, Dudek's independent evaluation of REU's WMP also focuses on risk identification and preemptive de-energization.

## 1.2 Changes to the WMP Submittal Process

The Wildfire Safety Advisory Board published several guidance documents at the end of 2025 and in early 2026 that included information about changes to the WMP submittal process for publicly owned electric utilities. Changes to PUC 8387 revised submittal requirements for POU WMPs from yearly to every two years. To spread out WMP review workloads, the WSAB modified the submission dates for WMPs from POUs. The WSAB's new guidance establishes a staggered submittal process in which a select group of POUs submits their WMPs each year for WSAB review. The WSAB published the final WMP submittal schedule in March 2026, with submittal schedules for more than 50 California public electric utilities. The state's public utilities were divided into groups, and each group was assigned a final submittal date for the 2026-2029 version of the utility's WMP in the first week of October. The

Redding Electric Utility is in the group whose WMPs are due for submittal on October 2, 2026. Under the new WMP submittal guidance, REU will not be required to resubmit its WMP to the WSAB for review until 2028.

The changes to the WSAB submittal schedule do not affect the requirement in PUC 8387(b)(3) to present its WMP at an appropriately noticed public meeting to accept comments from the public and other agencies. Before submitting its 2026-2029 WMP, REU staff will present their WMP at a public meeting.

## 1.3 Qualifications of the Independent Evaluator

PUC 8387 (C) states that a public electric utility must contract with a qualified independent evaluator with experience assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its WMP.

Dudek's Fire Prevention Planning team has prepared independent evaluator reports, wildfire risk assessments, and wildfire mitigation plans for publicly owned electric and water utilities and independent transmission operators since the State of California began requiring these plans for publicly owned utilities in 2019. Additionally, Dudek has worked with and prepared fire-prevention planning documents for new energy projects across California and the Pacific Northwest. Our Fire Prevention Planning Team includes National Fire Protection Association Certified Wildfire Mitigation Specialists and Fire Protection Engineers.

## 1.4 Assessment Methods

Dudek fire prevention planners prepared this independent evaluator's report using REU's draft 2026-2029 Wildfire Mitigation, as well as the following documents and datasets from REU:

- Draft PSPS Circuit Recommendations
- Outage Data tables
- Fire Incident and Wires Down Data tables
- Emergency Operations Data tables
- WMP Metric Data tables
- GIS datasets of REU circuits and facilities.

These datasets, in combination with the REU 2026-2029 WMP, were used to evaluate REU's service territory, utility-ignited wildfires, and potential ignition events, and wildfire risk drivers described in the WMP. Dudek also utilized publicly available datasets including:

- Weather and climate data (FEMS, WFTIIC, IEMS)
- Fuels and Fire Danger data (FEMS, WFTIIC)
- Local Fire History (CAL FIRE)

- PG&E Local Fire History (CPUC)

These datasets were used to assess the fire environment in REU's service territory and to verify the fire risk factors described in the WMP independently.

## 2 REU Service Territory

### 2.1 REU Service Territory Fire Environment Summary

Redding Electric Utility's service territory covers 61 square miles within the Redding city limits. Due to a combination of terrain, vegetation, and weather conditions, REU's service territory experiences frequent wildfires in the summer and fall. REU's service territory and the City of Redding cover an area of the northernmost portion of the Sacramento Valley. The Redding city center occupies the relatively flat valley bottom on either side of the Sacramento River. To the east and west of the Sacramento River, the terrain rises and becomes more rugged, and is characterized by hillsides and ridgelines bisected by steep drainages and canyons. Vegetation cover varies; REU's service territory contains a large Wildland Urban Interface area (62% of the service territory). Outside the highly urban city center west of the Sacramento River, there are very few areas in REU's service territory without a mix of developed and undeveloped areas. Instead, there is a transition to the east and west of the Sacramento River, where the amount of open space or undeveloped land gradually increases farther from the river. Undeveloped and open space areas contain a mix of Blue Oak Woodlands, Blue Oak-Foothill Pine Woodlands, Mixed Chaparral, and annual grasslands. Blue Oak Woodlands and Blue Oak-Foothill Pine Woodlands are the predominant vegetation cover types. These woodlands typically contain a continuous understory of grass and leaf litter, which can readily ignite and carry fire when weather conditions are conducive to fire growth. These woodlands also include an understory component of the shrub species found in the Mixed Chaparral areas (e.g., *Manzanita spp.*), which, combined with the grass/leaf litter layer and the low canopy of the blue oak, forms a pathway (e.g., fuel ladder) for surface fires to transition into the tree canopy (City of Redding 2024). Redding, like most of the Sacramento Valley, experiences hot, dry summers and cool, wet winters. Fire season in Redding, the period of the year when wildfires occur most frequently based on historical fire occurrence, begins in early summer, when the grasslands fully cure, and lasts through the fall, with the onset of the cooler, wetter period and the first wetting rains (NWCG n.d.). Fire season peaks, based on the occurrence of red flag warnings issued by the National Weather Service, from July through October (IEMS n.d.).

The Redding area has experienced numerous wildfires with overlapping historical fire perimeters in the mountainous terrain to the north, east, and west of the city center. The mountains to the west of the city have experienced the most frequent fires (CAL FIRE 2026). The most significant recent wildfires were the 2018 Carr Fire, whose perimeter included a portion of the city's west side and resulted in the destruction of more than 1600 structures and 7 deaths, and the 2021 Fawn Fire, whose perimeter included a portion of the city's north side and resulted in the destruction of 185 structures (CAL FIRE n.d.)

### 2.2 Fire Hazard Severity Zones

CAL FIRE designates areas in the state where there is an increased wildfire hazard based on previous fire occurrence and anticipated fire behavior. The areas with increased fire hazard are designated as fire hazard severity zones (FHSZ). They are present within a significant portion of REU's Service territory, covering almost the entire perimeter of the service territory except for a small section at the south end near Interstate 5. FHSZs extend from

the city limits towards the city center and the Sacramento River along the partially developed ridgelines and canyons on the north, east, and west sides of the service territory. Very High Fire Hazard Severity Zones are present along the north and west side of the service territory where heavier vegetation is common and more continuous, and there is a more frequent occurrence of wildfire (CAL FIRE, n.d.). The majority of REU's overhead circuits extend into an FHSZ, with only the Canby (1201, 1202, 1203, 1204), Canby (1701, 1702, 1703, 1704), and Canby (2401, 2402, 2403, 2403) substation circuits located outside of an FHSZ (REU 2026).

## 2.3 High Fire Threat Districts

The California Public Utilities Commission (CPUC) designates areas with an increased risk of utility-associated wildfires as High Fire Threat Districts. Like the FHSZ, a significant portion of REU's service territory, including the areas west of State Route 273 (Market Street) and east of Stillwater Creek, is designated as either Tier 2 or Tier 3 High Fire Threat Districts (HFTD). The west side of REU's service area contains all Tier 3 (extreme risk) areas. Like the FHSZ maps, the majority of REU's overhead circuits extend into an HFTD, with only the Canby (1201, 1202, 1203, 1204), Canby (1701, 1702, 1703, 1704), and Canby (2401, 2402, 2403, 2403) substation circuits located outside of an FHSZ (REU 2026).

# 3 Independent Evaluator Review of Regulatory Compliance

Public Utility Code (PUC) Section 8387 creates two requirements for each publicly owned electrical utility (POU) in California. First, each POU is required to construct, maintain, and operate its electrical lines and equipment in a manner that minimizes the risk of wildfire. Second, each POU is required to prepare a wildfire mitigation plan and submit it to the California Wildfire Safety Advisory Board (WSAB) at least once every four years.

PUC 8387 contains several subsections that outline the elements required in Wildfire Mitigation Plans prepared by POU's. Publicly owned utilities have been preparing WMPs since 2019, and with support from power agency associations, have successfully produced WMPs that contain the WMP elements required by PUC 8387(b)(2) for several years. Table 1 lists each PUC 8387(b)(2) required element and where it can be found in the 2026-2029 REU WMP.

**Table 1. PUC 8387(b)(2) Required Element Table and Location in REU WMP**

| PUC 8387 Subsection <sup>1</sup> | PUC 8387 Required Element Description      | WMP Section and Page No.                 | Section Title                              |
|----------------------------------|--------------------------------------------|------------------------------------------|--------------------------------------------|
| (b)(2)(A)                        | Person responsible for executing the plan  | 2.4; 3.1; 3.1.1, <b>Page 19-20,21-22</b> | Roles and Responsibilities                 |
| (b)(2)(B)                        | Objectives of the wildfire mitigation plan | 2.1; 2.3, <b>Page 15-17</b>              | Plan Objectives and Portfolio Architecture |

<sup>1</sup> REU's 2026-2029 WMP contains all of the PUC 8387 required elements.

| <b>PUC 8387 Subsection<sup>1</sup></b> | <b>PUC 8387 Required Element Description</b>                                                                                                                                                              | <b>WMP Section and Page No.</b>                                                            | <b>Section Title</b>                       |
|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|--------------------------------------------|
| (b)(2)(C)                              | Identification and prioritization of risks; preventive strategies                                                                                                                                         | 4.1-4.4; 5.1-5.3; 6.1-6.3; 7.1; 8.2, <b>Page 28-41, Page 42-56, Page 57-59, Page 60-65</b> | Risk Assessment and Mitigation Programs    |
| (b)(2)(D)                              | Evaluation of plan performance, including metrics                                                                                                                                                         | 10.1-10.10, <b>Page 74-82</b>                                                              | Performance Evaluation and Metrics         |
| (b)(2)(E)                              | Description of how metrics inform plan improvements                                                                                                                                                       | 2.3; 10.4-10.10; 12.4, <b>Page 17, Page 78-82, Page 92-93</b>                              | Continuous Improvement and Lessons Learned |
| (b)(2)(F)                              | Protocols for de-energization                                                                                                                                                                             | 4.1.3; 4.1.5; 5.3; 8.2 <b>Page 55</b>                                                      | PSPS and Operational Controls              |
| (b)(2)(G)                              | Procedures for customer notification before, during, and after de-energization                                                                                                                            | 8.4; 8.5 <b>Page 68-69</b>                                                                 | Customer Notification and Outreach         |
| (b)(2)(H)                              | Vegetation management activities and protocols                                                                                                                                                            | 5.1 <b>Page 42-48</b>                                                                      | Vegetation Management Program              |
| (b)(2)(I)                              | Inspections and maintenance of electrical infrastructure                                                                                                                                                  | 5.2 <b>Page 49</b>                                                                         | Asset Inspection Program                   |
| (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. | 4.1-4.3, <b>Page 28-40</b>                                                                 | Wildfire Risk and Risk Analysis            |
| (b)(2)(J)(i)                           | Risks and risk drivers associated with the design, construction, operation, and maintenance of the electric utility's equipment and facilities.                                                           | 4.1, <b>Page 28-35</b>                                                                     | Wildfire Risk and Risk Analysis            |
| (b)(2)(J)(ii)                          | Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the electric utility's service territory.                                 | 4.2 & 4.3, <b>Page 35-40</b>                                                               | Wildfire Risk and Risk Analysis            |
| (b)(2)(K)                              | Identification of any geographic area in the local publicly owned electric utility's or electrical cooperative's service territory that                                                                   | 1.1-1.2; 3.3.5; 4.2 <b>Page 36</b>                                                         | Geographic Risk Profile                    |

| PUC 8387 Subsection <sup>1</sup> | PUC 8387 Required Element Description                                                              | WMP Section and Page No.                                                                 | Section Title                                      |
|----------------------------------|----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|----------------------------------------------------|
|                                  | is a higher wildfire threat than is identified in a commission fire threat map                     |                                                                                          |                                                    |
| (b)(2)(L)                        | A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk | 4.1.1-4.1.5; 4.2; 4.3; 4.4                                                               | Risk Assessment Methodology                        |
| (b)(2)(M)                        | Procedures for restoration of service after de-energization or wildfire-related outages            | 8.3 <b>Page 67-68</b>                                                                    | Post-Fire Restoration and Recovery                 |
| (b)(2)(N)                        | Monitoring and auditing of plan implementation                                                     | 3.1.4; 9.1; 9.2; 9.4; 10; 12.4; 13.3 <b>Page 21-22, Page 70, Page 74-83, Page 92-93,</b> | Compliance, Monitoring, and Independent Evaluation |

## 4 Wildfire Mitigation Strategy Review and Understanding

The role of the Independent Evaluator according to PUC 8387 (c) is to “review and assess the comprehensiveness of (the utility’s) wildfire mitigation plan.” Dudek’s understanding of this text includes a requirement to assess whether the utility:

- A. Understands the wildfire risks present in its service territory.
- B. Understands the specific wildfire risks associated with its equipment and operations.
- C. Implements effective mitigation strategies to address these risks.

### 4.1 REU’s Understanding of Wildfire Risk in its Service Territory

REU’s 2026-2029 WMP does not divide wildfire risk and risk drivers into two categories described in CPUC 8387(b)(2)(j); rather, Section 4 of the WMP describes four key wildfire risk drivers in REU’s service territory: ignition probability, ignition pathways, risk timing and escalation, and consequence and suppression. Each of these risk drivers contains elements associated with both REU’s equipment and facilities as well as elements associated with climate and topography in REU’s service territory

### 4.1.1 Ignition Probability

Risk Driver 1, Ignition Probability, is based on more than 20 years of weather observations of sustained wind speeds in REU's service territory as measured at the Redding Airport RAWS and historical outage data for the same time period. REU links sustained wind speeds over 20 MPH with an increased likelihood of outage and equipment fault, and thus an increased likelihood of an ignition event.

Sustained winds in excess of 20 MPH are not a common cause of outages nor a common driver of electrical equipment fires or ignition events; 77 out of 914 recorded outages and 6 out of 77 event metrics in REU service territory are attributed to winds. However, based on historical outage records, the potential for outages increases as winds exceed 20 MPH. High winds are also a common factor in large, destructive fires in the region, with the 2018 Carr Fire, 2020 Zogg Fire, and 2021 Fawn Fire experiencing significant fire growth and extreme fire behavior driven by high winds (CAL FIRE n.d.). Because Risk Driver 1 is focused on sustained wind speed and not other factors influencing fire spread, Risk Driver 1 is not a measure of the likelihood that REU equipment ignites a wildfire; rather, it is a measure of the likelihood that an event that can create a spark, arcing, or other condition that would ignite nearby vegetation when conditions permit. Risk Driver 2 addresses the potential for a fire to start and spread.

### 4.1.2 Ignition Pathways

REU utilizes a three-stop methodology (baseline mapping, desktop analysis with expert review, and field verification) to determine Risk Driver 2: Ignition Pathways. This methodology entails integration of CAL FIRE Fire Hazard Severity Zone maps, CPUC High Fire-Threat District designations, aerial imagery, GIS data, multidisciplinary expert review, and field verification to determine areas where vegetation density, fuel continuity, and terrain conditions may enable an equipment fault to ignite and propagate as a wildfire.

Concerning baseline mapping, and as mentioned above in Section 2.2, Fire Hazard Severity Zones, and Section 2.3, High Fire Threat Districts, of this report, REU service territory is located within CAL FIRE designated Fire Hazard Severity Zones (FHSZs) and CPUC designated Fire Threat areas. The majority of REU's overhead circuits extend into an FHSZ. Baseline mapping identifies REU circuits and facilities in a FHSZ. Desktop analysis affirms the presence of topography and vegetation associated with the CAL FIRE FHSZ and CPUC HFTD classifications. Terrain within urbanized environment is predominantly flat, which is reflective of the city's location in the far north end of the Sacramento Valley; however, elevation rises toward the direction of the Coast ranges to the west, the Sierra Nevada foothills to the east, and north where both ranges converge and where the foothills of the Cascade mountain range (City of Redding 2024a, USGS 2021, USGS 2023a, USGS 2023b, USGS 2023c). Vegetation associated with blue oak woodland, blue oak foothill pine, mixed chaparral communities, and annual grassland make up much of the vegetation communities present and overlapping with FHSZs and HFTDs within the service boundary (CAL FIRE 2022 and City of Redding 2024b).

Although the WMP notes that field findings supersede desktop assessments, specific field visit locations were not provided for verification. However, Section 5, Operational Risk Reduction Programs, of the WMP details three programs—the Vegetation Management Program, the Asset Inspection Program, and the T&D System Operational Practices—that keep REU's infrastructure in a fire-safe state year-round, reducing ignition risk during the most severe weather. The results of implementing these programs are further described in Sections 10.4, 10.5, and 10.6 of the 2026 WMP.

The elements reviewed by Risk Drivers 1 and 2, combined, provide an assessment of the potential for ignition and fire spread. They do not include weather conditions beyond sustained wind speeds. Risk Driver 3 incorporates additional weather observations critical to determining fire risk.

### 4.1.3 Risk Timing and Escalation

Risk Driver 3, Fire Weather Risk Timing and Escalation, integrates real-time and forecast fire weather data that includes all key fire weather elements (e.g., temperature, relative humidity, wind direction, wind speed, etc.) Risk Driver 3 incorporates a custom Fire Potential Index based on national fire danger rating components (Energy Release Component and Burning Index), which are themselves derived from forecast weather and fuel moisture.

Whereas Risk Drivers 1 and 2 evaluate ignition event potential and fire severity and spread potential based on fuel loads and structure, Risk Driver 3 evaluates the conditions that influence fire severity and spread based on weather and fuel moisture.

Combined, Risk Drivers 1 through 3 create a comprehensive picture of wildfire risk in REU's service territory that includes the risk of a REU-equipment-ignited wildfire.

### 4.1.4 Consequence and Suppression

Risk Driver 4 evaluates the consequences of a REU equipment-ignited wildfire. REU evaluates consequence by analyzing community exposure (proximity to residences, critical facilities, and evacuation routes), suppression resource availability (fire station locations, response times, and staffing), and terrain accessibility using CAL FIRE/CPUC maps, aerial imagery, GIS data, multidisciplinary expert review, and field verification. These inputs are used to assign consequence tiers that reflect the potential impacts of an ignition event and the ability of suppression resources to access and contain a wildfire under varying conditions effectively.

Risk Driver 4 is based on qualitative assessments by subject matter experts (e.g., Redding Fire Department personnel) and is significantly influenced by the fire location's accessibility and the availability of local fire suppression resources.

Taken together, REU's 4 risk drivers provide the utility with a comprehensive understanding of wildfire risk in its service territory, including the risk that its equipment could start a wildfire and the consequences of an REU wildfire.

# 4.2 REU Wildfire Risk Mitigation Strategies

As identified in Section 4 of WMP, REU's equipment potential to ignite a wildfire (and be impacted by nearby wildfire) is a combination of area environmental conditions, specifically the combination of a prolonged summer-fall fire season with high wind events and the location of a large portion of REU distribution and transmission equipment in a high wildfire hazard area. The risk of REU's equipment igniting a wildfire is the highest during the peak of fire season, August-October, when the combination of weather and dry vegetation/fuel conditions is most likely to result in an ignition event starting a fast-moving and difficult-to-suppress fire.

REU deploys several wildfire mitigation strategies intended to reduce the risk of its equipment starting a wildfire. One of the most significant changes from previous versions of REU's WMP is the inclusion of a robust situational awareness program (Operational Decision Support (ODS) Program). This increased situational awareness includes daily wildfire outlooks during periods of higher fire danger and real-time weather and fire-danger forecasts during elevated events. The products of the ODS inform REU's operational states; since 2020, REU has recorded 67 operational alert-level activations (Levels I or II) and only one level III activation (active emergency). Twenty-three of these were due to increased extreme fire danger and five due to an active wildfire in the Redding area. In addition to enhanced situational awareness capabilities, REU implements operational and capital risk-reduction strategies. Operational risk reduction strategies include its well-established vegetation management program and asset inspection programs. Capital risk reduction strategies include a suite of equipment hardening programs that have continued to expand in scope from the 2023 WMP. Table 2 lists the wildfire risk drivers in REU's service territory and the mitigation strategies that impact its overall risk.

**Table 2 REU Wildfire Risk Driver to Risk Mitigation Strategy Comparison**

| Wildfire Mitigation Strategy                              | Wildfire Risk Driver                            | Relationship to Ignition Event/Outage Data                                                                                                                                  | Comment                                                                |
|-----------------------------------------------------------|-------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| <i>Operational Risk Reduction</i>                         |                                                 |                                                                                                                                                                             |                                                                        |
| Vegetation Management (Line Clearance)                    | Ignition probability, Ignition pathways         | Vegetation contact with wires is the most common fire/ignition event, accounting for 20% of utility-caused fires/ignition events but less than 1% of outages.               | REU completes vegetation inspections on all T&D lines annually.        |
| Vegetation Management (Pole Clearance and Fuel Reduction) | Ignition pathways, consequence, and Suppression | Pole clearance and fuel reduction don't eliminate fire risk but reduce the likelihood of rapid fire growth at ignition point. Limits fire intensity and duration near poles | REU completes pole clearance annually before start of peak fire season |

| Wildfire Mitigation Strategy            | Wildfire Risk Driver                                                                             | Relationship to Ignition Event/Outage Data                                                                                                          | Comment                                                                                                                          |
|-----------------------------------------|--------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| Asset Inspection Program                | Ignition probability, Ignition pathways                                                          | Equipment failure accounts for 15% of utility-caused fires/ignition events and 20% of outages.                                                      | REU completes asset inspections on all T&D lines annually.                                                                       |
| T&D System Operational Practices        | Ignition probability, Ignition pathways, Risk Timing and Escalation                              | Operating states and Alert Levels are based on wildfire risk                                                                                        | PSPS activation is informed by fire risk and weather forecasts.                                                                  |
| PSPS                                    | Ignition probability, Ignition pathways, Risk Timing and Escalation                              | REU has de-energized lines 7 times in response to requests from the fire department due to a nearby incident                                        | Recorded de-energization events are not due to REU equipment causing a fire.                                                     |
| <b>Capital Risk Reduction</b>           |                                                                                                  |                                                                                                                                                     |                                                                                                                                  |
| System Hardening Program                | Ignition probability, Consequence and Suppression                                                | Equipment failure accounts for 15% of utility-caused fires/ignition events. Animal contact accounts for %10 of utility-caused fires/ignition events | Arc-suppression devices address fires caused by equipment failure; wildfire protection addresses fires caused by animal contact. |
| Fire Mitigation System Upgrades Program | Ignition probability, Consequence and Suppression                                                |                                                                                                                                                     | In the evaluation phase, no mitigation was done.                                                                                 |
| Fire Retardant Pole Wrap                | Ignition probability, Ignition pathways, Risk Timing and Escalation, Consequence and suppression | Six (out of 77) recorded instances of REU wood poles being damaged by wildfire or structure fires near poles.                                       | Pole wrapping addressing risk of pole/lines being damaged by fire only.                                                          |
| <b>Situational Awareness</b>            |                                                                                                  |                                                                                                                                                     |                                                                                                                                  |
| Operational Decision Support Program    | Ignition Probability, Risk Timing and Escalation, Consequence and Suppression                    | 56% of alert levels and operating state changes due to Red Flag Warning, 10% due to wildfire                                                        | Informed by weather forecast and fire danger forecast                                                                            |

| Wildfire Mitigation Strategy     | Wildfire Risk Driver                             | Relationship to Ignition Event/Outage Data | Comment                                                                            |
|----------------------------------|--------------------------------------------------|--------------------------------------------|------------------------------------------------------------------------------------|
| Situational Awareness Technology | Ignition Probability, Risk Timing and Escalation |                                            | No records of listed technologies being involved with fire detection or prevention |

## 4.3 REU Public Safety Power Shutoff

REU, like many POUs, views Public Safety Power Shutoffs as a last resort. However, REU has continued to develop its PSPS program since the publication of its first WMP in 2020, when it was limited and implemented only at the request of emergency services during an active incident. The current PSPS program described in the 2026-2029 WMP is integrated into REU's operating states and alert-level framework, so that the use of a PSPS is assessed and REU's preparedness to implement one is begun well before any PSPS is implemented. The WMP describes the REU's PSPS implementation sequence, including staff responsibilities and the implementation timeline, as well as restoration when the PSPS is no longer necessary.

The Wildfire Safety Advisory Board (WSAB) December 2025 guidance provided specific recommendations to REU to add more detail in its WMP regarding the potential use for a PSPS, including (OEIS 2025):

1. describe the data and data sources used to make that decision;
2. describe the procedures to collect data and verify those data are accurate and up to date;
3. identify parties responsible for making a decision and the criteria used
4. describe the necessary actions to implement a de-energization and the parties responsible for executing them;
5. define the "extreme fire event" under which it would make a real-time decision whether to de-energize.

Sections 4.4 and 5.3 in REU's 2026-2029 WMP address the WSAB recommendations 1-4. Recommendation 5 is addressed in Section 4.1 and in REU's operating states table, Table 4-2a.

## 5 Wildfire Mitigation Strategy Execution

Section 10 of REU's 2026-2029 describes the utility's accomplishments in 2025. Section 10 describes the following:

- Elevated operating states
- Wind observations exceeding REU established thresholds (>20 mph)
- WMP tracked event metrics
- Vegetation inspection and management
- Asset inspection and corrective actions
- System hardening/upgrades

### 5.1 Elevated operating states

REU recorded 99 operating state changes in 2025, with the majority being a change from OS0 (normal operating conditions) to OS1 (elevated fire risk). Only 5 operating state changes from OS1 to OS2 (extreme fire risk) were recorded. This is consistent with the number of Red Flag Warnings issued by the National Weather Service in 2025 for the forecast zone that Redding is in.

### 5.2 Wind observations exceeding REU established thresholds (>20 mph)

Sustained winds in excess of 20 mph are an identified risk driver (Risk Driver 1) in the WMP and tracked by REU. According to the WMP, 2025 had an elevated occurrence of sustained winds exceeding this threshold. 2025 experienced the most outages based on REU's outage data from 2020 to present. However, only two outages were directly attributed to wind as a primary or supplemental cause.

### 5.3 WMP Tracked Event Metrics

Section 10 provides records for six tracked metrics. All six metrics: REU-attributed wildfire ignitions, Equipment-related wires-down events, PSPS events activated, P1 defects closed within 72 hours, Vegetation-caused outages (total), and P1 conditions at time of inspection are event/outcome based metrics. WMP metric data generally indicate success in REU's implementation of its wildfire mitigation strategies. Negative outcome events (REU-attributed wildfire ignitions, P1 conditions at time of inspection, and Equipment-related wires-down events) are trending downward. At the same time, positive outcome events (P1 defects closed within 72 hours) are at 100%. Vegetation-caused outages increased from 2024. The WMP stresses that this is not due to a failure to perform an inspection or identify line clearance. As noted above, outages were significantly higher in 2025 than in the four

years preceding it, and this increase may reflect a higher number of outages overall rather than an indication that vegetation-related outages are trending upward.

## 5.4 Vegetation Inspection and Management

REU met all of its vegetation management activity targets in 2025, performing vegetation management around transmission assets by October and around all of its distribution assets by December. REU completed tree trimming on all trees identified for line clearance and around the base of all poles identified for pole base clearance. REU completed more than 500 acres of fuel reduction work

## 5.5 Asset Inspection and Corrective Actions

REU completed the majority of its asset inspections in 2025, performing patrol inspections at 99% of targeted locations, detailed inspections at 100%, and intrusive inspections at 99%. REU completed all P1 and P2 corrective actions within the required time limit.

## 5.6 System Hardening/Upgrades

In 2025, REU installed system-hardening features (pole-top retrofits, arc-suppression devices, and wildlife-protection covers) at 94 of 127 targeted locations (74%). 370 new pole protective wraps were installed, exceeding the target goal of 250.

REU has consistently met vegetation management goals since 2021 and completed the majority of asset inspections since 2020. REU is set to complete its pole-wrapping goal (1,251 poles) and its system-hardening goal (127 targeted locations) in 2026.

## 6 Conclusion

The Redding Electric Utility service territory and the surrounding area have an elevated wildfire risk due to a combination of terrain and vegetation features conducive to large growth, a protracted summer-fall season with extreme fire weather events, and the presence of overhead electric facilities in or near high fire hazard areas. Within these high fire hazard areas, there are significant portions of REU's overhead line circuits and facilities that, due to their proximity to continuous unmanaged vegetation, could ignite a wildfire if an ignition event (vegetation contacting an energized line or equipment failure) occurred. While not responsible for any recent large catastrophic wildfire, REU's service territory and the area around Redding has experienced several recent destructive wildfires, including the 2018 Carr Fire.

Redding Electric Utilities' 2026-2029 Wildfire Mitigation Plan is a comprehensive document that details each required PUC 8387 (2) element. The review assessed whether the plan satisfies applicable PUC requirements, reflects an appropriate understanding of wildfire risk and risk drivers in REU's service territory, and identifies mitigation strategies that are responsive to those risks. Redding Electric Utility's 2026-2029 WMP reflects an understanding of the wildfire risks present in its service territory through its partnerships with the Redding Fire Department, its use of weather and fire-danger monitoring for real-time analysis of weather and fire-danger conditions during fire season and wildfire outlook products, and an alert-level framework based on wildfire potential. REU's operating state is based on the products of this weather and fire-danger analysis, and the WMP describes a utility that modifies its system settings to minimize the risk of ignition from its equipment. REU's PSPS program, though considered a last resort option, is integrated into this situational awareness and operating state framework. As a result, REU's PSPS program is not an add-on mitigation strategy; rather, its use is analyzed as fire danger increases and REU shifts to a higher operating state. REU wildfire mitigation strategies are responsive to the specific risks in REU's service territory. As an example of this, REU has a robust vegetation inspection and management program with a priority methodology based on the potential for contact with its wires or overhead equipment. This vegetation management program targets the significance of vegetation contact with wires in fires involving REU equipment (20% of all reported incidents) targets. The WMP also demonstrates REU's investment in long-term wildfire risk-reduction strategies, including an equipment-hardening program designed to reduce the likelihood that REU equipment in high-fire-hazard areas will ignite and a pole-wrap program intended to improve pole-and-line survivability during a wildfire.

The Wildfire Safety Advisory Board (WSAB) released guidance to POU's in their December 2025 publications regarding the contents of each POU's WMP. REU received specific guidance from the WSAB to include a more detailed description of their PSPS processes. The contents of REU's 2026-2029 WMP address this request, describing REU's incorporation of the use of PSPS in their operating state system, the triggers for evaluating PSPS use, and a PSPS sequence.

In summary, REU's 2026-2029 Wildfire Mitigation Plan addresses each required element of Public Utilities Code Section 8387 and demonstrates a proactive and risk-informed approach to wildfire prevention, operational readiness, and system resiliency. The plan reflects REU's commitment to continuous improvement through enhanced situational awareness, targeted vegetation management, system hardening investments, and clearly defined operational protocols intended to reduce the likelihood and consequences of utility-related ignitions. By incorporating WSAB guidance, strengthening its PSPS framework, and aligning mitigation strategies with the

specific wildfire risks present within its service territory, REU has developed a WMP that supports both regulatory compliance and the ongoing protection of public safety, utility infrastructure, and the communities it serves.

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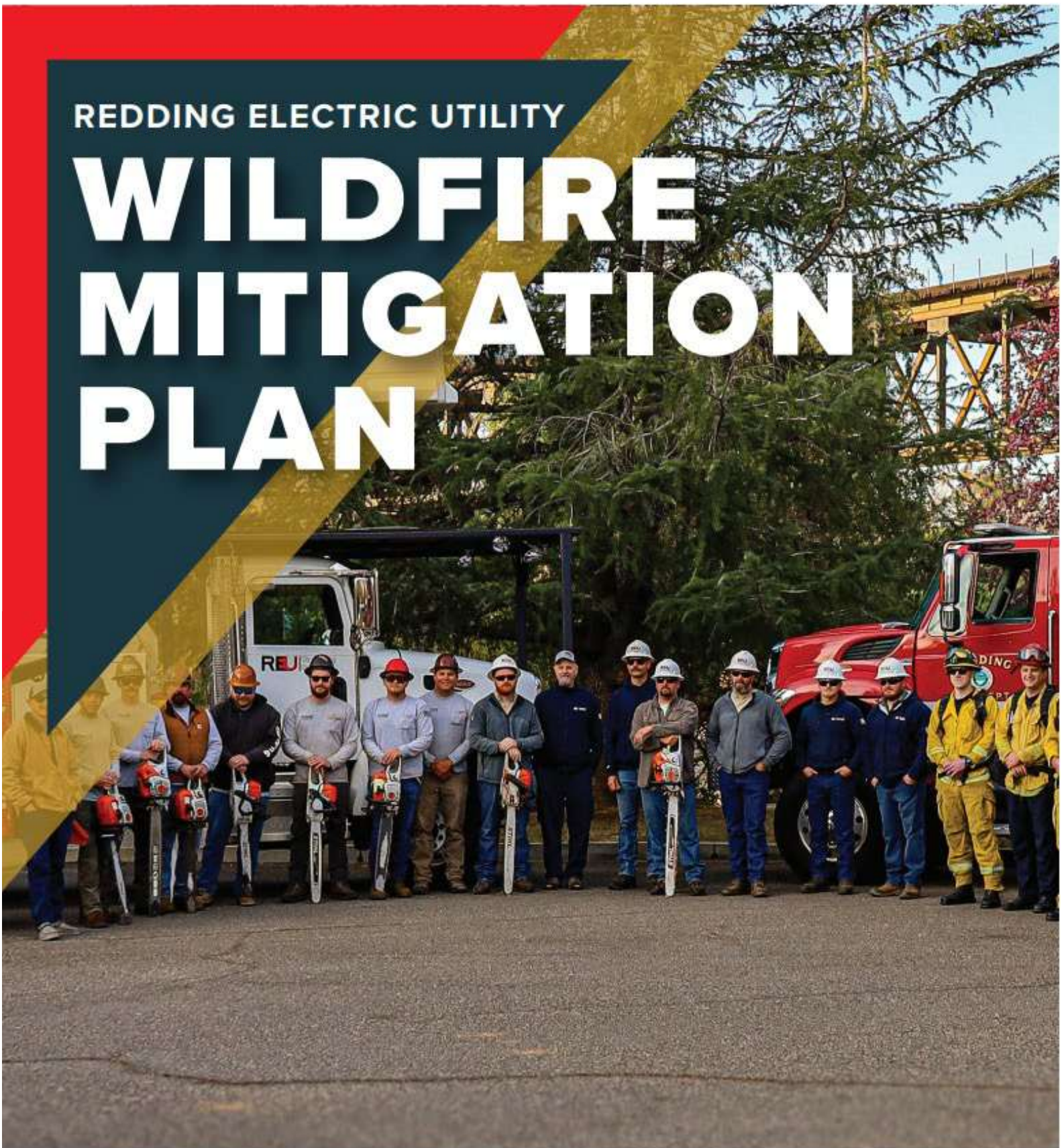
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REDDING ELECTRIC UTILITY

# WILDFIRE MITIGATION PLAN



Revised August 18, 2026



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## Acronyms and Abbreviations

AER: After-Event Report

ANSI: American National Standards Institute

AVL: Automatic Vehicle Location

BI: Burning Index

CAL FIRE: California Department of Forestry and Fire Protection

Cal OES: California Governor’s Office of Emergency Services

CalTrans: California Department of Transportation

CIP: Capital Improvement Program

CMUA: California Municipal Utilities Association

CPAW: California Public-Power Agencies Wildfire Collaborative

CPUC: California Public Utilities Commission

CUEA: California Utility Emergency Association

DOC: Department Operations Center

EOC: Emergency Operations Center

EOPS: Emergency Operations

EPSS: Enhanced Powerline Safety Settings

ERC: Energy Release Component

ESRI: Environmental Systems Research Institute (GIS platform)

FEMA: Federal Emergency Management Agency

FEMS: Fire Environment Mapping System

FHSZ: Fire Hazard Severity Zone

FLIR: Forward-Looking Infrared

FP: Facility Protection (vegetation priority classification)

## **REU 2026 Wildfire Mitigation Plan**

FPI': Fire Potential Index (REU custom variant)  
GIS: Geographic Information System  
GO: General Order (CPUC)  
GPS: Global Positioning System  
HFTD: High Fire-Threat District  
IC: Incident Commander  
ICS: Incident Command System  
IE: Independent Evaluator  
ISA: International Society of Arboriculture  
kV: Kilovolt  
NFDRS: National Fire Danger Rating System  
NWS: National Weather Service  
ODS: Operational Decision Support  
OEIS: Office of Energy Infrastructure Safety  
OMS: Outage Management System  
OS: Operating State  
P1–P5: Priority Levels 1 through 5 (defect classification)  
PRC: Public Resources Code  
PSPS: Public Safety Power Shutoff  
PUC: Public Utilities Code  
QA/QC: Quality Assurance / Quality Control  
RAWS: Remote Automatic Weather Station  
REU: Redding Electric Utility  
RFD: Redding Fire Department  
ROC: Risk Oversight Committee  
ROW: Right-of-Way  
RPD: Redding Police Department  
SCADA: Supervisory Control and Data Acquisition  
SEMS: Standardized Emergency Management System  
SHASCOM: Shasta Area Safety Communications Agency  
SME: Subject Matter Expert  
SOP: Standard Operating Procedure  
TRAQ: Tree Risk Assessment Qualification  
UAV: Unmanned Aerial Vehicle

## **REU 2026 Wildfire Mitigation Plan**

USDA: United States Department of Agriculture

VHFTD: Very High Fire-Threat District

VM: Vegetation Management

WCAG: Web Content Accessibility Guidelines

WMP: Wildfire Mitigation Plan

WSAB: Wildfire Safety Advisory Board

WUI: Wildland-Urban Interface

## **ES Executive Summary**

---

### **ES-A: About This Plan**

Redding Electric Utility is a publicly owned municipal electric utility serving approximately 46,750 customers across a compact 61-square-mile service territory in the northern Sacramento Valley. REU owns and operates 115 kV transmission and 12 kV distribution systems totaling approximately 626.3 miles of overhead conductor and approximately 1,051.21 miles of underground distribution. Over 33% of the service territory lies within CPUC Tier 2 High Fire-Threat Districts and 12.5% within Tier 3, with 38% classified as Wildland-Urban Interface. The 2018 Carr Fire, which killed eight people, destroyed over 1,000 homes and over 1,600 structures at the edge of Redding's urban core, defines the community's baseline understanding of wildfire consequence.

This plan is organized as a two-part document. Part I (1–9) describes what REU's wildfire mitigation system is, how it works, and why. Part II (10–13) reports how REU performed in the prior year and describes the initiatives for the years ahead. REU's mitigation effort is structured as an integrated portfolio of eleven programs organized into five layers: governance, risk intelligence, operational risk reduction, capital risk reduction, and customer and community resilience. A feedback loop returns findings from every layer back into program improvement.

The plan is filed pursuant to PUC § 8387 and submitted to the WSAB as REU's biennial comprehensive revision. Every WSAB advisory recommendation from 2021 through 2025 is addressed in Table 1-3, and every PUC § 8387 subsection is mapped in Table 1-2.

### **ES-B: This Year's Report**

In 2025, REU completed its most comprehensive wildfire mitigation execution year to date. Vegetation inspections achieved 100% coverage on both transmission and distribution systems. Arborist Crews trimmed 8,602 identified trees, completed 100% of pole base clearance by May, and treated 512 acres through targeted fuels reduction. The most severe (P1) vegetation conditions declined from 286 to 163, a 43% reduction. The Asset Inspection Program identified 1,588 defects and corrected all 42 of the most critical defects (P1) within 72 hours.

In 2025, REU recorded one verified utility-attributed ignition, the lowest annual total in the five-year reporting period and a significant reduction from nine in 2021. Equipment-related wires-down events declined to four, down from eight in each of the two prior years. In its first year of formal PSPS program operation, REU recorded zero PSPS events. These outcomes are consistent with the cumulative effects of REU's sustained investment in vegetation management, equipment inspection, and operational practices across the wildfire risk system. REU's primary wildfire program outcome metrics are shown in Table ES-1. Full metric definitions and program-level performance data are provided in Section 10.

## REU 2026 Wildfire Mitigation Plan

**Table ES-1: REU Outcome Metrics: Five-Year Trend (2021–2025)**

| Metric                                | 2021 | 2022 | 2023 | 2024 | 2025 |
|---------------------------------------|------|------|------|------|------|
| Reportable Ignition Events            | 9    | 4    | 4    | 4    | 1    |
| Equipment-related wires-down events   | 5    | 7    | 8    | 8    | 4    |
| EOPS Alert Level 1 due to Fire Danger | 11   | 5    | 3    | 3    | 4    |
| EOPS Alert Level 2 due to Fire Danger | 2    | 1    | 0    | 0    | 0    |
| PSPS events                           | N/A  | N/A  | N/A  | N/A  | 0    |

For the 2026–2027 cycle, REU will continue to evolve implementation across all mitigation programs. Key priorities include refining the portfolio governance program and strengthening individual program charters with program-level KPIs; advancing the Wildfire Risk Framework through more sophisticated analytical methods that improve spatial resolution and risk classification of assets across the system; updating the Operational Decision Support program to reflect the improved risk framework outputs; revising the more general Emergency Operations program to ensure wildfire risk is comprehensively addressed; and improving outage tracking and root cause analysis capabilities. Because the Wildfire Risk Framework serves as the analytical foundation for the entire mitigation portfolio, its advancement will drive corresponding improvements across vegetation management, inspection prioritization, system hardening, and operational practices.

# 1 Introduction

---

Redding faces two conditions that create serious wildfire risk: a service territory with significant fire exposure and a climate that is becoming hotter and drier. REU must operate an electric system that remains safe and reliable under these conditions.

## 1.1 REU Service Territory at a Glance

Table 1-1 summarizes the key attributes of REU's service territory, electric system, and wildfire risk profile. These numbers establish the factual baseline referenced throughout both parts of this plan.

**Table 1-1: REU Service Territory at a Glance**

| Attribute                                 | Value             |
|-------------------------------------------|-------------------|
| Service Territory                         | 61 square miles   |
| Customers Served                          | 46,758 accounts   |
| Population Served                         | 92,465            |
| Overhead Distribution (inside territory)  | 527.1 miles       |
| Overhead Distribution (outside territory) | 27.6 miles        |
| Overhead Transmission (inside territory)  | 50.9 miles        |
| Overhead Transmission (outside territory) | 20.7 miles        |
| Underground Distribution                  | 1,051.2 miles     |
| System Underground Percentage             | Approximately 63% |
| % Territory in CPUC Tier 2 HFTD           | 33.5%             |
| % Territory in CPUC Tier 3 HFTD           | 12.5%             |
| % OH Distribution Lines in Tier 2         | 24.55%            |
| % OH Distribution Lines in Tier 3         | 7.25%             |
| % OH Transmission Lines in Tier 2         | 44.8%             |
| % OH Transmission Lines in Tier 3         | 10.95%            |
| Wildland-Urban Interface (Interface)      | 38%               |
| Wildland-Urban Interface (Intermix)       | 24%               |
| Fire Stations Within City                 | 8                 |

## REU 2026 Wildfire Mitigation Plan

|                              |                                                              |
|------------------------------|--------------------------------------------------------------|
| Department Operations Center | REU Headquarters<br>3611 Avtech Parkway<br>Redding, CA 96002 |
|------------------------------|--------------------------------------------------------------|

As a department of the City of Redding, REU's wildfire mitigation decisions are recommended by staff, reviewed and approved in open City Council sessions, and the program is funded through REU rates.

### 1.2 Why Wildfire Risk Matters in Redding

Redding's geographic position creates persistent, serious wildfire exposure. The city's boundaries interface directly with oak woodland, chaparral, and mixed conifer terrain, which are among the most fire-prone landscapes in California. Thirty-eight percent of the service territory falls within the Wildland-Urban Interface, with an additional 24% classified as WUI intermix. Over 33% of the territory lies within CPUC Tier 2 High Fire-Threat District and 12.5% within Tier 3.

The 2018 Carr Fire, ignited by sparks from a vehicle's blown tire on the highway west of Redding, defines the community's baseline understanding of wildfire consequences. Record-low fuel moisture, temperatures exceeding 110 degrees, and dry, unpredictable winds allowed the fire to spread rapidly from steep terrain into Redding's western suburbs. At its peak intensity, the fire generated a fire vortex over 200 feet wide with winds exceeding 140 miles per hour. The fire resulted in eight fatalities, and over 1,600 structures were destroyed. For the City of Redding, wildfire is a lived experience that shapes how this community thinks about safety, preparedness, and the obligations of its public institutions.

For REU, that experience translates into a specific operational responsibility because electric infrastructure can ignite wildfires when it fails. REU's overhead distribution system includes over 24 miles of circuit in Tier 3 HFTD and over 92 miles in Tier 2 on the 12 kV system alone. Every program in this plan exists to reduce the probability that REU's infrastructure causes an ignition and to limit consequences when conditions are at their most severe.

#### Climate Change

The wildfire risk environment continues to change. Climate change is measurably intensifying wildfire conditions across Redding's service territory, resulting in extended fire seasons, increased frequency and severity of extreme heat events, accelerated fuel drying, and greater year-to-year climate variability that drives more dangerous fire weather. These trends directly affect REU's exposure: a longer fire season means more days on which an equipment failure can produce a catastrophic ignition, and drier fuels mean faster spread when a fire starts.

Climate projections inform REU's annual wildfire-risk assumptions. Section 4.3 provides the detailed analysis and explains how projected changes affect REU's programs.

## 1.3 Statutory and Regulatory Framework

REU prepares this plan pursuant to California Public Utilities Code Section 8387. Table 1-2 maps every statutory requirement to this plan. Table 1-3 responds to every WSAB advisory recommendation from 2021 through 2025.

**Table 1-2: PUC § 8387 Statutory Crosswalk**

| PUC § 8387 | Requirement                                                                             | 2026 Section                         | Topic                                              |
|------------|-----------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------|
| (b)(2)(A)  | Person responsible for executing the plan                                               | 2.4; 3.1; 3.1.1                      | Roles and Responsibilities                         |
| (b)(2)(B)  | Objectives of the wildfire mitigation plan                                              | 1.4; 2.1; 2.3                        | Plan Objectives and Portfolio Architecture         |
| (b)(2)(C)  | Identification and prioritization of risks; preventive strategies                       | 4.1-4.4; 5.1-5.3; 6.1-6.3; 7.1; 8.2  | Risk Assessment and Mitigation Programs            |
| (b)(2)(D)  | Evaluation of plan performance, including metrics                                       | 10.1-10.10                           | Performance Evaluation and Metrics                 |
| (b)(2)(E)  | Description of how metrics inform plan improvements                                     | 2.3; 10.4-10.10; 12.4                | Continuous Improvement and Lessons Learned         |
| (b)(2)(F)  | Protocols for de-energization                                                           | 4.1.3; 4.1.5; 5.3; 8.2               | PSPS and Operational Controls                      |
| (b)(2)(G)  | Procedures for customer notification before, during, and after de-energization          | 8.4; 8.5                             | Customer Notification and Outreach                 |
| (b)(2)(H)  | Vegetation management activities and protocols                                          | 5.1                                  | Vegetation Management Program                      |
| (b)(2)(I)  | Inspections and maintenance of electrical infrastructure                                | 5.2                                  | Asset Inspection Program                           |
| (b)(2)(J)  | Description of fire risk and risk analysis                                              | 4.1-4.3                              | Wildfire Risk and Risk Analysis                    |
| (b)(2)(K)  | Geographic areas at elevated risk                                                       | 1.1-1.2; 3.3.5; 4.2                  | Geographic Risk Profile                            |
| (b)(2)(L)  | Methodology for risk assessment and risk drivers                                        | 4.1.1-4.1.5; 4.2; 4.3; 4.4           | Risk Assessment Methodology                        |
| (b)(2)(M)  | Procedures for restoration of service after de-energization or wildfire-related outages | 8.3                                  | Post-Fire Restoration and Recovery                 |
| (b)(2)(N)  | Monitoring and auditing of plan implementation                                          | 3.1.4; 9.1; 9.2; 9.4; 10; 12.4; 13.3 | Compliance, Monitoring, and Independent Evaluation |
| (c)        | Independent evaluation of the plan                                                      | 9.4; 13.3                            | Independent Evaluation                             |

## REU 2026 Wildfire Mitigation Plan

**Table 1-3: WSAB Advisory Opinion Response**

| #  | WSAB Recommendation                                                                | Years      | Section                | How Addressed                                                                                                                                                                                                        |
|----|------------------------------------------------------------------------------------|------------|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Summary table of projects with targets and years                                   | 2024-25    | 11.1-11.3              | Table 11-1 and the 2026-2028 planning sections provide program goals, measurable outcomes, completion targets, and year-based planned work for upcoming initiatives.                                                 |
| 2  | Digital accessibility (WCAG, alt text, hyperlinked TOC)                            | 2024-25    | 13.2                   | The plan is prepared with machine-readable text, alt text on figures, and a hyperlinked table of contents, and is intended for public accessibility posting.                                                         |
| 3  | Track changes and revision history                                                 | 2022-25    | 13.5                   | Section 13.5 provides the formal revision history table for the plan.                                                                                                                                                |
| 4  | Context-setting information at beginning of plan                                   | 2021-23    | ES-A; 1.1; 1.2         | The Executive Summary and Introduction establish service-territory context, system facts, wildfire exposure, and why wildfire risk matters in Redding.                                                               |
| 5  | Expand mapping beyond HFTD using FHSZ and local knowledge                          | 2021, 2025 | 4.2                    | Section 4.2 explains that REU uses CAL FIRE Fire Hazard Severity Zone mapping in addition to CPUC HFTD designations and incorporates local knowledge from REU and Redding Fire Department.                           |
| 6  | Inventory equipment, including treatment of exempt and non-exempt assets           | 2021, 2025 | 10.9                   | Section 10.9 documents identified poles, eligible poles, and exempt poles within the Fire-Retardant Pole Wrap Program, including reclassification of exempt poles.                                                   |
| 7  | Incorporate climate change data                                                    | 2021-23    | 4.3.1                  | Section 4.3.1 includes climate change discussion covering temperature, extreme heat, hydroclimate volatility, snowpack, wildfire area, and wind patterns, and explains how REU reviews climate projections annually. |
| 8  | Justify enhanced practices that exceed minimum standards                           | 2021-25    | 5.1; 5.2               | Sections 5.1 and 5.2 describe REU-specific vegetation clearance targets that exceed minimum GO 95 standards where feasible and explain risk-based prioritization and enhanced treatment in higher-risk areas.        |
| 9  | Specific targets and timelines for hardening projects                              | 2024-25    | 6.1-6.3; 11.1-11.3     | Capital program sections describe the hardening programs, and Section 11 provides measurable outcomes and completion targets for upcoming work.                                                                      |
| 10 | Define PSPS protocols, including data sources, conditions, and responsible parties | 2021-25    | 4.1.3; 4.1.5; 5.3; 8.2 | These sections define the FPI/wind thresholds, operating states, PSPS decision logic, operational execution steps, and Incident Commander authority.                                                                 |
| 11 | Pre-stage personnel protocols                                                      | 2023, 2025 | 5.3; 8.2               | These sections describe patrol posture, escalation of operational controls, and emergency-response framework elements used when elevated conditions require readiness actions.                                       |

## REU 2026 Wildfire Mitigation Plan

|    |                                                                       |         |                    |                                                                                                                                                                                                          |
|----|-----------------------------------------------------------------------|---------|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12 | Address invasive grasses                                              | 2022-23 | 5.1                | Section 5.1 includes invasive grass management as part of targeted fuels reduction and coordinated landscape-level mitigation.                                                                           |
| 13 | Detail QA/QC programs, including contractor oversight                 | 2024-25 | 5.1                | Section 5.1 includes a Quality Assurance and Corrective Action subsection describing QA/QC controls, audits, reinspection, data checks, retraining, and corrective action.                               |
| 14 | Performance metrics showing both completed work and outcomes          | 2021-25 | 10; ES-B           | Section 10 and the Executive Summary report both execution metrics and outcome metrics, including inspection coverage, trees trimmed, acres treated, defects identified, and critical defects corrected. |
| 15 | Use CMUA performance metric structure                                 | 2025    | 10                 | Section 10 provides standardized annual performance reporting by program and portfolio outcomes.                                                                                                         |
| 16 | Historical data showing progress and informing changes                | 2022-25 | ES-B; 10           | The plan includes five-year outcome trend tables in the Executive Summary and historical performance/results discussion in Section 10.                                                                   |
| 17 | Substantive independent evaluation addressing strategy and compliance | 2021-25 | 9.4; 13.3          | Section 9.4 describes the independent evaluation and Section 13.3 states that the evaluator's findings and REU's response are publicly posted.                                                           |
| 18 | Track independent evaluator recommendations from prior evaluations    | 2025    | 9.4; 13.3          | Section 9.4 describes REU's engagement of the independent evaluator, and Section 13.3 provides for public posting of findings and REU's response.                                                        |
| 19 | Describe situational awareness and data sharing                       | 2025    | 7.1; 7.2; 3.2; 3.3 | These sections describe the Operational Decision Support program, situational awareness technology, and coordination/data-sharing relationships with City and regional partners.                         |

### 1.4 How This Plan Is Organized

The 2026 WMP is organized as a two-part document serving two distinct purposes.

Part I (1–9) is the static program document. It describes REU's wildfire mitigation portfolio and is updated only when programs materially change. Part I covers REU's risk framework, the five-layer portfolio of eleven programs, roles and responsibilities, and the governance structure that binds the system together.

Part II (10–13) is the annual performance report. It documents REU's prior year performance and the coming year work plan, covering 2025 metric actuals, year-over-year trend analysis, lessons learned, the 2026–2028 planned work program, and the multi-year capital roadmap.

## 2 Portfolio Architecture

REU organizes its wildfire mitigation effort as an integrated portfolio of coordinated programs. Each program has a distinct role, defined ownership, and explicit connections to the programs that precede and follow it. The portfolio is designed to convert wildfire risk understanding into action, evaluate whether those actions are working, and use the results to improve future decisions. This structure supports accountability, integration across functions, and continuous improvement across the full wildfire mitigation system.

The portfolio is organized in five functional layers: governance and cross-cutting oversight, risk intelligence, operational risk reduction, capital risk reduction, and customer and community resiliency. Risk intelligence informs operational and capital decisions. Operational findings and annual performance results feed back into the governance structure and are used to adjust priorities, standards, and future work plans. This structure allows the portfolio to function as a managed system with coordinated programs.

### 2.1 Portfolio Overview

Table 2-1 summarizes the portfolio layers, their roles, and how each connects to the broader wildfire mitigation system.

**Table 2-1: Portfolio Overview**

| # | Layer                                  | Programs                                                                                                                       | Role                                                                                                                                                                         | Portfolio Connections                                                                                                   |
|---|----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| 1 | Governance and Cross-Cutting Oversight | <ul style="list-style-type: none"> <li>WMP Portfolio Governance</li> <li>Safety Program</li> <li>Compliance Program</li> </ul> | Establishes the accountability structure, governance cadence, documentation standards, regulatory tracking, and cross-cutting controls that apply across the full portfolio. | Governs all layers; supports integration, regulatory alignment, corrective action tracking, and continuous improvement. |

## REU 2026 Wildfire Mitigation Plan

|   |                            |                                                                                                                                                               |                                                                                                                                                                                                         |                                                                                                                                                                   |
|---|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2 | Risk Intelligence          | <ul style="list-style-type: none"> <li>• Wildfire Risk Framework</li> <li>• Operational Decision Support</li> </ul>                                           | Produces the analytical foundation for the portfolio. The Wildfire Risk Framework defines annual wildfire risk, and ODS applies that logic in daily and forecasted operating conditions.                | Feeds risk outputs into operational, capital, and customer programs; receives performance feedback through governance and annual review.                          |
| 3 | Operational Risk Reduction | <ul style="list-style-type: none"> <li>• Vegetation Management</li> <li>• Asset Inspection Program</li> <li>• T&amp;D System Operational Practices</li> </ul> | Maintains the system in a fire-safe operating condition on a continuous basis through vegetation clearance, equipment inspection and correction, and operational controls during elevated fire weather. | Uses risk intelligence outputs to prioritize work and escalation; performance findings feed back into governance and planning.                                    |
| 4 | Capital Risk Reduction     | <ul style="list-style-type: none"> <li>• System Hardening</li> <li>• Fire Mitigation System Upgrades</li> <li>• Fire-Retardant Pole Wrap</li> </ul>           | Reduces long-term wildfire risk through targeted infrastructure investment, system upgrades, and asset protection measures in higher-risk areas.                                                        | Priorities are driven by the Wildfire Risk Framework and annual performance findings; capital investment reduces the risk load on operational programs over time. |

## REU 2026 Wildfire Mitigation Plan

|   |                                   |                                                                                                                                 |                                                                                                                                                                         |                                                                                                                                                             |
|---|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5 | Customer and Community Resiliency | <ul style="list-style-type: none"><li>• Customer Service and Communications</li><li>• Emergency Response and Recovery</li></ul> | Manages the customer and community impacts of wildfire risk and mitigation actions, including PSPS communication, emergency coordination, and restoration and recovery. | Coordinates with operational and emergency functions; after-action findings and event experience feed back into governance and future program improvements. |
|---|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 2.2 Portfolio Design Principles

REU's wildfire mitigation portfolio is designed around five principles.

First, wildfire mitigation is managed through a common portfolio governance structure that coordinates each program's work. Each program has its own charter and execution responsibilities, but all programs operate within a common ownership, reporting, and review structure.

Second, risk intelligence drives action. The Wildfire Risk Framework and ODS provide the analytical basis for where work is prioritized, how operations escalate, and where future capital investment should be concentrated.

Third, the portfolio distinguishes between operational risk management and structural risk reduction. Vegetation management, inspection, and operational controls reduce risk continuously but require repeated intervention. Capital programs reduce risk more durably by changing the underlying condition of the system.

Fourth, cross-cutting governance functions apply across the full portfolio. Governance, compliance, and safety complement program ownership by providing controls that keep the portfolio accountable, auditable, and aligned with regulatory obligations and internal standards.

Fifth, the portfolio is designed to learn. Annual metric review, after-action review, program reporting, and executive oversight are intended to ensure that findings translate into updated standards, improved execution, and revised priorities in future years.

## 2.3 Program Interdependencies and Feedback

The portfolio is designed so that outputs from each layer feed the next, and outcomes from all layers feed back into the first through a continuous improvement cycle. An overview of REU's wildfire mitigation portfolio is shown in Figure 2-1.

## REU 2026 Wildfire Mitigation Plan

Diagram showing REU's wildfire mitigation portfolio organized around risk intelligence, operational risk reduction, capital risk reduction, customer and community resiliency, and a safety and compliance governance foundation.

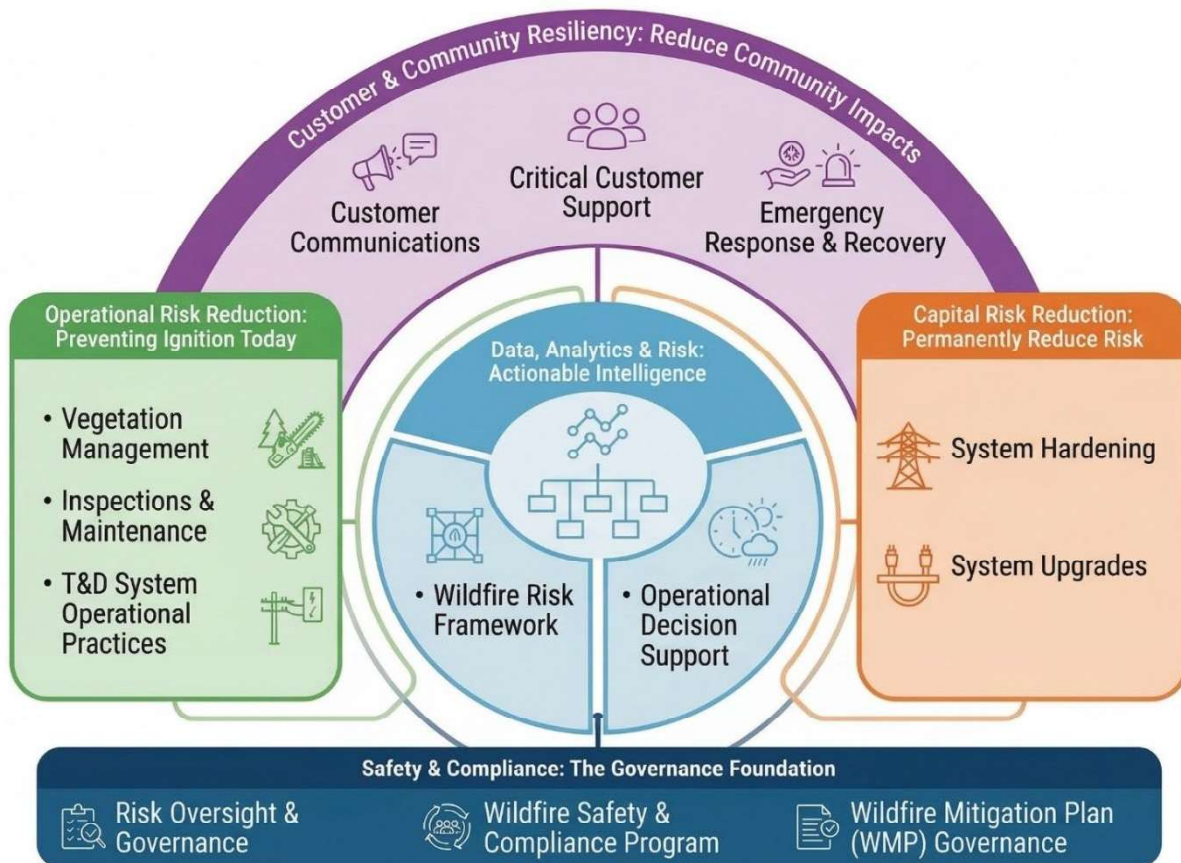


Figure 2-1: REU Wildfire Mitigation Portfolio

Risk Framework outputs establish annual priorities, and ODS converts the same logic into daily guidance. Operational and capital programs use those outputs to target work, prioritize investment, and determine when operating posture should change. Customer and community resiliency programs use the same information to coordinate notifications, customer support, and emergency response.

Operational findings, event reviews, annual metrics, and completed capital work return through governance to update thresholds, standards, program charters, and future priorities. This feedback loop keeps the portfolio aligned as risk conditions, system configuration, and program performance change.

## 2.4 Governance and Ownership

Table 2-2 assigns each program to a category owner and program manager. Section 3 defines the responsibilities and governance relationships associated with those roles.

## REU 2026 Wildfire Mitigation Plan

**Table 2-2: Portfolio Ownership Structure**

| Category                        | Category Owner                        | Program                            | Program Manager                     |
|---------------------------------|---------------------------------------|------------------------------------|-------------------------------------|
| Data, Analytics & Risk          | Assistant Director, T&D               | Wildfire Risk Framework            | Assistant Director, T&D             |
| Data, Analytics & Risk          | Assistant Director, T&D               | Operational Decision Support (ODS) | Assistant Director, T&D             |
| Operational Risk Reduction      | Assistant Director, T&D               | Vegetation Management              | Electric Manager – Field Operations |
| Operational Risk Reduction      | Assistant Director, T&D               | Asset Inspection Program           | Electric Manager – Field Operations |
| Operational Risk Reduction      | Assistant Director, T&D               | T&D System Operational Practices   | Electric Manager - E&O              |
| Capital Risk Reduction          | Assistant Director, T&D               | System Hardening                   | Electric Manager - Line             |
| Capital Risk Reduction          | Assistant Director, T&D               | Fire Mitigation System Upgrades    | Electric Manager - E&O              |
| Capital Risk Reduction          | Assistant Director, T&D               | Fire Retardant Pole Wrap           | Electric Manager - Line             |
| Customer & Community Resiliency | Assistant Director, Customer Services | Customer Service & Communications  | Electric Manager - Customer Svcs    |
| Customer & Community Resiliency | Assistant Director, T&D               | Emergency Response & Recovery      | Electric Manager - E&O              |

## 3 Roles and Responsibilities

REU's wildfire mitigation portfolio requires coordination across multiple city departments and regional agencies. The governance structure, city partnerships, and mutual aid relationships described here are legally required under PUC § 8387(b)(2)(A) and represent commitments REU must maintain regardless of annual program changes.

### 3.1 REU Internal Governance

REU's wildfire mitigation portfolio is governed through a multi-level structure that distinguishes executive accountability, portfolio oversight, governance administration, and program execution. The Electric Utility Director serves as Portfolio Owner, accountable for portfolio integrity and for evaluating remaining wildfire risk in relation to mitigation posture and resource decisions. The REU Risk Oversight Committee serves as the executive oversight body for the portfolio. The Assistant Director, Transmission and Distribution, provides day-to-day portfolio oversight and coordination across wildfire mitigation programs. The Compliance Officer serves as Portfolio Governance Lead for the WMP Portfolio Governance Program and is responsible for governance cadence, documentation control, regulatory tracking, and portfolio integration support. Programs are executed through designated Program Owners and Program Managers, typically at the Electric Manager level.

**Table 3-1: Governance Roles**

| Role                      | Assigned To                    | Primary Responsibilities                                                                                                                                    |
|---------------------------|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Portfolio Owner           | Electric Utility Director      | Owns the WMP as an enterprise obligation; approves portfolio structure; evaluates remaining wildfire risk in relation to mitigation posture                 |
| Portfolio Governance Lead | Compliance Officer             | Manages the WMP Portfolio Governance Program; coordinates governance cadence, documentation control, regulatory tracking, and portfolio integration support |
| Program Owner             | Defined by program (Table 2-2) | Owns individual programs; maintains program charter and annual report; accountable for execution                                                            |
| Risk Oversight            | Risk Oversight Committee       | Reviews/approves material changes; executive direction; ensures enterprise risk tolerance consistency                                                       |

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|                    |                        |                                                                                      |
|--------------------|------------------------|--------------------------------------------------------------------------------------|
| Compliance Program | REU Compliance Program | Tracks cadence, regulatory changes, document control; escalates missed obligations   |
| Safety Program     | REU Safety Program     | Ensures safe execution; captures incidents and near-misses; provides safety feedback |

### 3.1.1 Risk Oversight Committee

The Risk Oversight Committee (ROC) consists of the Electric Utility Director, the Assistant Directors of Transmission & Distribution, Resources, and Customer Services and Metering, the Chief Information Officer, the Compliance Officer, and the chairs of the subordinate committees. The ROC meets quarterly and reviews and approves material changes to wildfire mitigation programs and the overall portfolio.

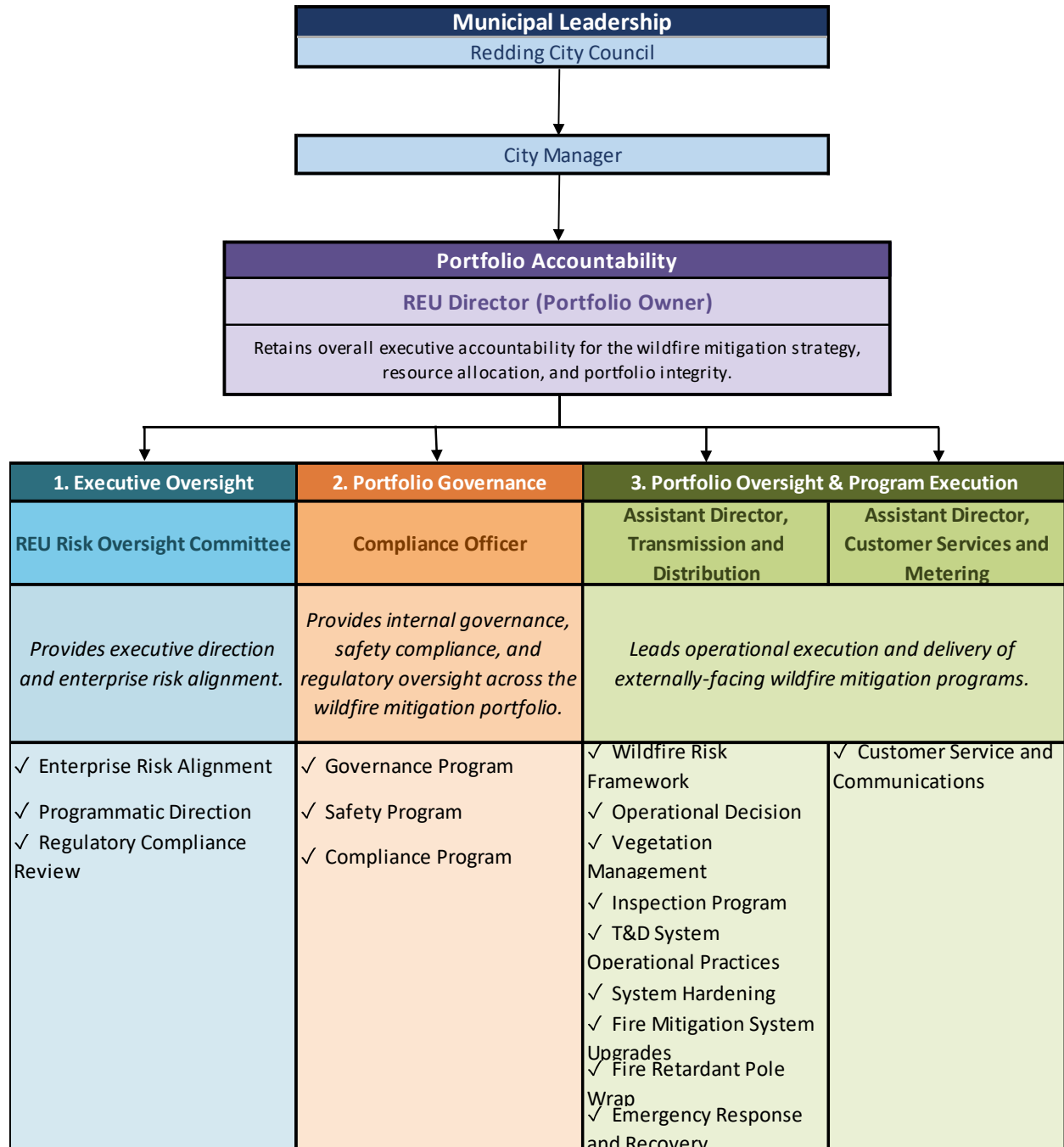
### 3.1.2 Program Charter System

Each of REU's eleven programs maintains a two-part Program Charter that mirror the Wildfire Mitigation Plan: Part I for stable program definition, Part II for annual performance. This makes the portfolio auditable at any point and enables City Council presentations to draw directly from Part II reports.

## REU 2026 Wildfire Mitigation Plan

### Organizational Chart

Organizational chart showing wildfire mitigation governance from the Redding City Council and City Manager to the REU Director, Risk Oversight Committee, Compliance Officer, and Assistant Directors responsible for program execution.



*Figure 3-1: REU Wildfire Mitigation Governance Organizational Chart. Diagram showing REU's wildfire mitigation portfolio organized around risk intelligence, operational risk reduction, capital risk reduction, customer and community resiliency, and a safety and compliance governance foundation.*

## REU 2026 Wildfire Mitigation Plan

### Governance Calendar

**Table 3-2: Governance Calendar**

| Timeframe                       | Governance Activity                                                     | Responsible                |
|---------------------------------|-------------------------------------------------------------------------|----------------------------|
| Q4 (prior year)                 | Confirm program scope and ownership for upcoming year                   | Portfolio Governance Lead  |
| January                         | Collect execution data; initiate tracking for annual obligations        | Program Owners; Compliance |
| February                        | Draft Annual Program Reports (Part II); review with Steering Committees | Program Owners             |
| March                           | Finalize reports; review material changes with ROC; finalize charters   | Program Owners; ROC        |
| April – May                     | Draft updated Wildfire Mitigation Plan                                  | Portfolio Owner            |
| June -July                      | Present WMP to City Council (annual)                                    | Portfolio Owner            |
| Following City Council adoption | Submit WMP to WSAB via OEIS portal (biennial)                           | Portfolio Governance Lead  |
| 2026 (quadrennial)              | Independent evaluation of WMP                                           | Portfolio Governance Lead  |

## 3.2 City of Redding Coordination

REU operates as a department of the City of Redding. Wildfire mitigation is a coordinated effort involving multiple city departments.

**Table 3-3: City Coordination Partners**

| Agency / Department       | Role in REU Wildfire Mitigation                                                                                                             | Governing Agreement                 |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| Redding Fire Department   | Joint wildfire response; facility access coordination; interagency response coordination; input on areas of fire concern and public safety. | City Council-approved program       |
| Redding Police Department | PSPS public safety; traffic control; evacuation support                                                                                     | City interdepartmental coordination |
| Public Works Department   | 8 workers funded by REU; WUI fuel reduction partnership                                                                                     | City Council-approved program       |

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|                                     |                                                                     |                                     |
|-------------------------------------|---------------------------------------------------------------------|-------------------------------------|
| Community Services / Communications | Public notification, social media, outage portal, and website       | City interdepartmental coordination |
| SHASCOM Dispatch                    | Dispatch for PSPS area notifications; emergency communication relay | Regional dispatch agreement         |

### 3.2.1 Redding Fire Department

During 2025, REU provided funding support to the Redding Fire Department through the Council-approved Wildfire Improved Response Program and plans to continue that support in 2026. The partnership strengthens local emergency-response capacity, supports rapid initial attack when fires threaten REU facilities or electric infrastructure, and facilitates coordination with CAL FIRE and Shasta County during wildfire incidents. Program scope and funding are reviewed through the City's annual planning, budget, and Council-approval processes.

### 3.2.2 Redding Police Department

RPD provides public safety support during PSPS events and wildfire emergencies, including traffic control and evacuation support.

### 3.2.3 Public Works Department

REU funds eight PW workers for vegetation management and WUI fuel reduction in partnership with the Parks Department Fuels Mitigation Team.

### 3.2.4 Community Services and Communications

All public-facing wildfire communications are coordinated through the City Communications Team, including social media, media releases, and outage portal updates.

### 3.2.5 SHASCOM Dispatch

SHASCOM serves as the regional dispatch agency for PSPS area notifications and emergency communication relay.

## 3.3 Regional and State Coordination

### 3.3.1 CPAW

REU participates in the California Public-Power Agencies Wildfire collaborative for shared wildfire mitigation practices and regulatory coordination.

## **REU 2026 Wildfire Mitigation Plan**

### **3.3.2 Cal OES and SEMS**

REU operates within the Cal OES and SEMS framework for all emergency operations. SOP-200 implements ICS consistent with SEMS requirements, ensuring interoperability with CAL FIRE and Shasta County OES.

### **3.3.3 Mutual Aid - CUEA**

REU is a member of CUEA, providing access to mutual aid crews and materials during catastrophic events.

### **3.3.4 Joint Pole Coordination**

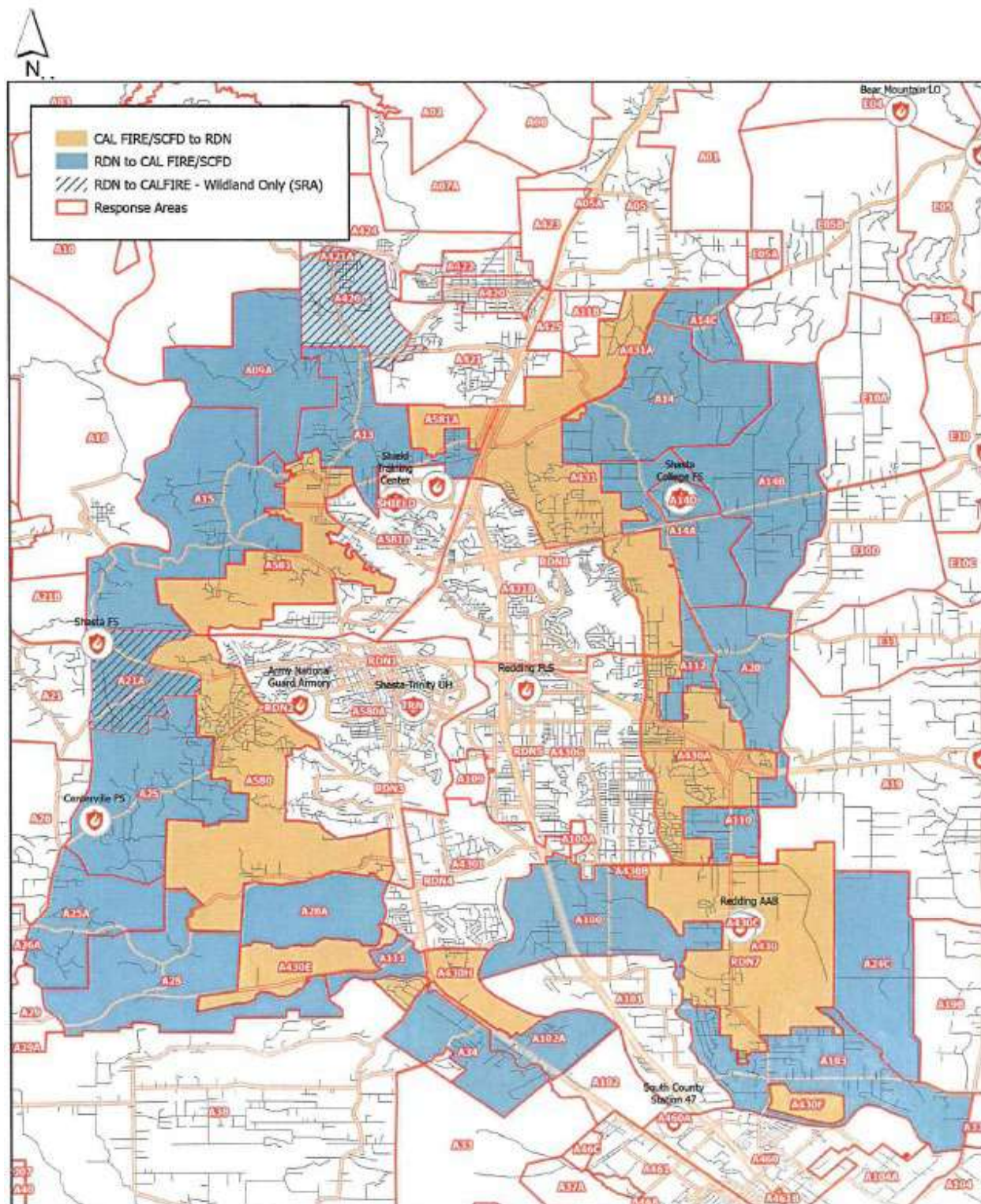
REU shares pole infrastructure with other electric utilities, telecommunications and cable providers, with coordination protocols for planned work, emergency access, and cost sharing.

### **3.3.5 CAL FIRE / Redding Fire Department Mutual Threat Zone**

The City of Redding maintains a Mutual Threat Zone (MTZ) Agreement with CAL FIRE / Shasta County Fire Department that establishes a defined joint-response area along the city's wildland edge. The MTZ covers approximately one-half mile inside the City limits and one-half mile outside the City limits, as shown in Figure 3-2. Within this area, the agreement provides for coordinated, year-round response by both agencies to fires, traffic collisions, and wildland incidents threatening the interface. The purpose of the agreement is to improve protection in this boundary area by sending the closest appropriate resources, reducing response times, and formalizing cross-jurisdictional response expectations, communications, and operating procedures.

The MTZ is particularly important in Redding because it includes a substantial portion of the community's wildland-urban interface, where rapid suppression access and resource depth can materially affect consequence. During fire season, the agreement supports a multi-agency response to confirmed fires threatening the wildland and allows coordinated use of CAL FIRE suppression resources consistent with the operating plan, including specialized wildland resources such as engines, dozers, aircraft, air tankers, helicopters, and hand crews. When incidents occur within the MTZ, the agreement provides for reciprocal support and, where conditions warrant, unified command and single-point ordering of additional resources through the incident organization.

For REU, the MTZ is an important external coordination element within the broader wildfire risk environment. It does not replace REU's prevention and mitigation responsibilities, but it strengthens suppression capability in and around REU's highest-consequence interface areas by formalizing coordination between Redding Fire and CAL FIRE, including dispatch, communications, and resource-sharing protocols. That coordination is relevant to REU's wildfire consequence and suppression-feasibility considerations discussed elsewhere in this plan.



## 4 Wildfire Risk and Risk Drivers

REU evaluates wildfire risk through a sequential, integrated framework built around four risk drivers. Each driver addresses a distinct dimension, and no single driver is used in isolation. The combined result produces REU's risk picture as a structured assessment that informs specific decisions across every program in the portfolio.

### 4.1 The Four-Driver Risk Framework

**Table 4-1: Four-Driver Risk Framework Overview**

| # | Risk Driver               | Core Question                                                         | How Outputs Are Used                                                                                         |
|---|---------------------------|-----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| 1 | Ignition Probability      | How likely is the electric system to produce an ignition source?      | Wind-based operational thresholds; PSPS wind criteria; inspection prioritization                             |
| 2 | Ignition Pathways         | If a failure occurs, is there a credible path from fault to wildfire? | Vegetation Management targeting; hazard tree prioritization; fuels reduction; exclusion of low-pathway areas |
| 3 | Risk Timing & Escalation  | When do conditions escalate risk to an operational concern?           | Operating State determination; FPI'-based escalation; PSPS consideration windows                             |
| 4 | Consequence & Suppression | If a fire starts, how severe would the outcome be?                    | PSPS circuit selection; capital prioritization                                                               |

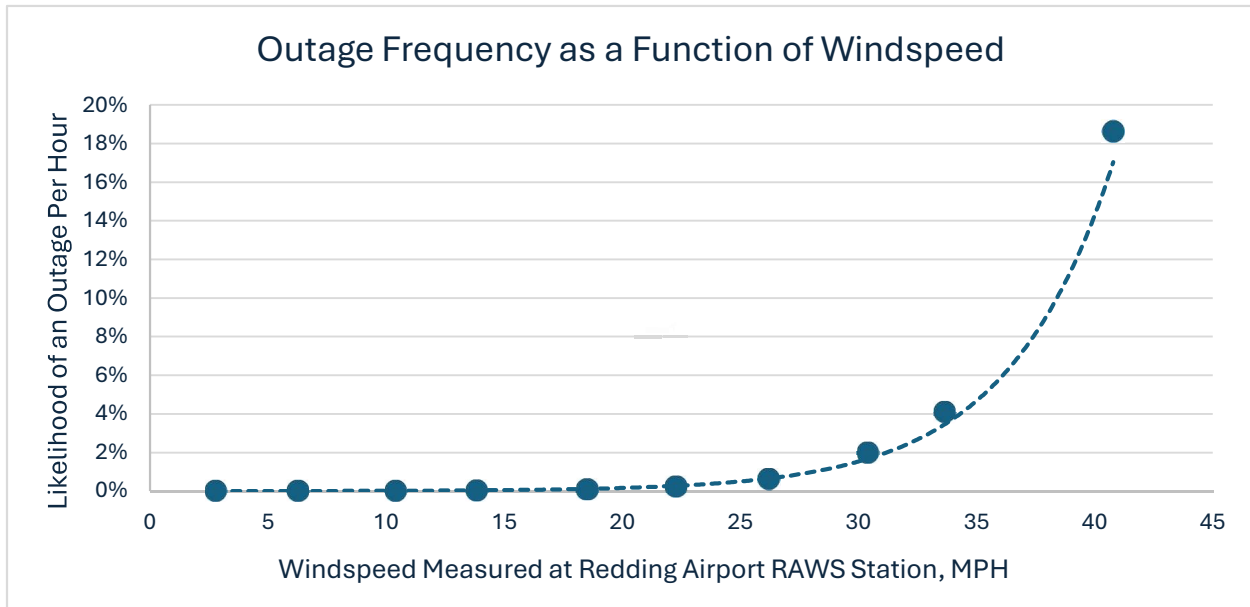
#### 4.1.1 Risk Driver 1: Ignition Probability

This driver evaluates the probability that a fault, failure, or equipment condition could produce a spark or arc capable of igniting vegetation. REU's assessment is empirically grounded in more than 20 years of historical outage data analyzed in relation to observed wind speeds.

REU's analysis demonstrates a critical threshold: sustained wind speeds exceeding 20 mph produce a significantly increased likelihood of faults and equipment failures on the overhead distribution and transmission system. Figure 4-1 visualizes this relationship, showing outage frequency as a function of wind speed across REU's PSPS-eligible circuits since January 1, 2005. The data shows limited wind-related response below approximately 20 mph. At and above 20 mph sustained wind speeds, however, wind begins to emerge as a more significant driver of outage activity, as mechanical stress on conductors, crossarms, and connections becomes more operationally consequential.

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This empirical relationship forms the foundation for REU's wind-speed-based operational thresholds. As wind speeds increase beyond 20 mph, the probability that any given equipment fault will produce an arc and potential ignition increases proportionally, driving the Operating State escalation framework and PSPS trigger thresholds. The primary outputs are wind-speed-based thresholds for escalating operational response, which are detailed in Risk Driver 3 (Risk Timing & Escalation).



*Figure 4-1: Outage Frequency as a Function of Wind Speed. Chart showing that the likelihood of an outage per hour increases as measured wind speed increases, with a sharp rise at higher wind speeds above approximately 30 miles per hour.*

### 4.1.2 Risk Driver 2: Ignition Pathways

This driver evaluates whether the environment surrounding REU's overhead facilities creates conditions where an equipment failure could transition to a wildfire. The assessment uses a three-step methodology: baseline mapping, desktop analysis with expert review, and field verification.

REU begins with CAL FIRE Fire Hazard Severity Zone maps and CPUC High Fire-Threat District designations as the starting point. These maps identify areas with increased wildfire susceptibility due to any cause.

REU conducts a circuit-by-circuit desktop review using aerial imagery, GIS data, and subject matter expert judgment. Subject matter experts from T&D, Vegetation Management, Operations, Engineering, GIS/Analytics, and the Redding Fire Department

## REU 2026 Wildfire Mitigation Plan

jointly evaluate circuits and segments using the aerial imagery and fire threat maps as a conservative baseline. This step identifies where credible ignition pathways exist:

- Segments with dense vegetation, continuous fuel loading, or terrain conditions that would allow an equipment fault to transition to wildfire spread are confirmed as pathways.
- Segments where aerial imagery and maps provide insufficient clarity are flagged for field verification.
- Segments with minimal combustible vegetation, sparse fuel continuity, or limited exposure to wildland fuels may be explicitly excluded from pathway consideration.

Where desktop review cannot resolve uncertainty, REU conducts field visits with the Redding Fire Department and other subject matter experts from City departments. Field assessment directly observes vegetation density, fuel loading, terrain access, and proximity to structures. Field findings supersede desktop assessments. Outputs include identification of circuit segments and locations with credible ignition pathways.

### 4.1.3 Risk Driver 3: Fire Weather Risk Timing and Escalation

This driver integrates real-time and forecast fire weather data to determine when environmental conditions make ignition consequences most severe. REU uses a custom Fire Potential Index (FPI') as its primary risk timing indicator, computed from two National Fire Danger Rating System (NFDRS) components sourced from the USDA Forest Service Fire Environment Mapping System (FEMS): Energy Release Component (ERC), which represents cumulative fuel dryness and potential fire spread energy, and Burning Index (BI), which represents potential fireline intensity and flame length.

FPI' combines ERC and BI using a methodology based on the Severe Fire Danger Index<sup>1</sup> framework, by computing a percentile rank for each forecasted hour against 20 years of hourly historical fire weather data for REU's service territory. This normalization ensures FPI' values reflect conditions that are extreme relative to REU's local historical norms. A high FPI' value indicates the simultaneous presence of dry fuels (high ERC) and wind-driven conditions (high BI), which together produce the most dangerous fire behavior.

REU downloads hourly weather forecasts from the FEMS<sup>2</sup> website and calculates an hourly Fire Potential Index for each forecast period. This calculated FPI' is compared against dynamic operational thresholds that define when conditions warrant escalation in system posture. Higher FPI' values require lower wind speeds to trigger operational response, while lower FPI' values require higher wind speeds. This relationship reflects the potential for extreme fuel dryness to produce dangerous conditions at moderate wind

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<sup>1</sup> Jolly, W. Matt; Freeborn, Patrick H.; Page, Wesley G.; Butler, Bret W. 2019. Severe Fire Danger Index: A forecastable metric to inform firefighter and community wildfire risk management. Fire. 2: 47.

<https://research.fs.usda.gov/treesearch/58973#>

<sup>2</sup> <https://fems.fs2c.usda.gov/download>

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speeds, while less extreme fuel conditions require more severe winds to reach comparable risk.

FPI' is evaluated together with forecast wind speeds to determine when operational thresholds are exceeded:

Table 4-2a: Operating State Definitions and Triggers

| Operating State | Name                  | Trigger Conditions                                                                                          | Key Distinction                                                                  |
|-----------------|-----------------------|-------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| OS0             | Normal Operations     | No elevated fire weather conditions                                                                         | Standard operations; no fire weather controls active                             |
| OS1             | Elevated Fire Risk    | FPI' > 0.90 forward-looking 3-hour average forecast sustained wind > 15 mph, OR NWS Red Flag Warning issued | Heightened awareness and system controls; PSPS not implemented                   |
| OS2             | Extreme Fire Risk     | FPI'/wind thresholds met per Table 4-2b                                                                     | PSPS consideration active; suppression resources available                       |
| OS3             | Extreme + Constrained | OS2 conditions AND fire suppression resources limited or unavailable                                        | PSPS expanded to additional circuits; suppression capacity cannot be relied upon |

Table 4-2b: OS2/OS3 FPI'/Wind Threshold Criteria

| FPI' Threshold    | Wind Speed              | Condition                                                                        |
|-------------------|-------------------------|----------------------------------------------------------------------------------|
| FPI' $\geq$ 0.97  | $\geq$ 20 mph sustained | Very high fire danger; moderate wind triggers PSPS                               |
| FPI' $\geq$ 0.875 | $\geq$ 23 mph sustained | High fire danger; stronger wind is required to trigger PSPS                      |
| FPI' $\geq$ 0.825 | $\geq$ 26 mph sustained | Moderate-high fire danger with extreme wind-driven potential                     |
| FPI' $\geq$ 0.80  | $\geq$ 50 mph sustained | Extreme wind-driven behavior required to initiate PSPS despite lower fuel danger |

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|                  |                         |                                                                    |
|------------------|-------------------------|--------------------------------------------------------------------|
| FPI' $\leq$ 0.80 | PSPS is not considered. | PSPS is not considered by the FPI'/wind model below this threshold |
|------------------|-------------------------|--------------------------------------------------------------------|

Between the listed FPI' reference points, REU's ODS model linearly interpolates the sustained wind threshold. Meeting the FPI'/wind threshold does not automatically result in PSPS; it initiates further evaluation under the full four-driver framework, including consequence tier, suppression feasibility, operational feasibility, and Incident Commander authorization.

Additionally, National Weather Service Fire Weather Watches and Red Flag Warnings are integrated as contextual triggers. A Red Flag Warning is sufficient to trigger OS1 regardless of real-time FPI'/wind values.

REU applies ramp-up and ramp-down timeframes so escalation and de-escalation decisions reflect sustained risk conditions and account for short-lived forecast fluctuations.

| Parameter                             | Description                                                                                                                                                                                                                              | Value (Hours) |
|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| Exceedance Duration Threshold         | Nominal number of consecutive forecasted hours above OS2/OS3 FPI'/wind thresholds used as a guideline before considering Operating State escalation.                                                                                     | 6             |
| Initiation Lead Time                  | Lead time applied prior to the first forecasted hour of OS2 or OS3 exceedance to allow orderly implementation of operational controls                                                                                                    | 2             |
| Look-Ahead Sustainment Window         | Forward-looking window used to evaluate whether elevated conditions are expected to persist or recur, supporting sustainment of Operating State posture                                                                                  | 12            |
| Termination Duration Threshold        | Nominal number of consecutive hours below thresholds, with no forecasted near term exceedance, used as a guideline before considering deescalation.                                                                                      | 4             |
| Night Patrol / Restoration Constraint | Daylight dependent guideline: patrol and restoration activities will not begin until safe daylight conditions are available. The '1 hour' value indicates a nominal evaluation interval, not the total duration of nighttime conditions. | 1             |

These parameters are reviewed annually and updated as part of the Wildfire Risk Framework governance and continuous improvement process.

### 4.1.4 Risk Driver 4: Consequence and Suppression Feasibility

This driver evaluates the potential impact of a wildfire ignition event originating from REU infrastructure. Like Risk Driver 2 (Ignition Pathways), it uses baseline mapping, desktop analysis with expert review, and field verification. The assessment evaluates suppression resource availability, terrain accessibility, and community exposure.

As with Risk Driver 2, REU begins with CAL FIRE Fire Hazard Severity Zone maps and CPUC High Fire-Threat District designations, then conducts a circuit-by-circuit desktop review using aerial imagery, GIS data, and subject matter expert judgment from T&D Operations, Engineering, GIS/Analytics, the Redding Fire Department, and other City of Redding subject matter experts. This step evaluates:

- Community exposure based on proximity to residences, critical facilities, evacuation routes, and population density.
- Suppression resource positioning based on RFD station locations, response time, and resource availability.
- Terrain and access constraints based on the ability of fire suppression equipment and personnel to effectively reach the circuit and the surrounding terrain.

Outputs are Consequence Tier designations (Tier 0 through Tier 3) for each evaluated circuit segment. The distinction between Tier 2 and Tier 3 reflects the accessibility of suppression resources. Tier 2 circuits are located in areas with good terrain access, adequate water availability, and proximity to fire stations, which support effective suppression under normal conditions. Tier 3 circuits have more constrained terrain, more difficult access, potentially limited water availability, or greater distance from fire stations. Tier 2 circuits generally present manageable consequences when suppression resources are available and positioned to respond. If those resources are committed elsewhere or otherwise unavailable, Tier 2 circuits are treated as Tier 3 for operational risk purposes. Accordingly, Tier 2 circuits are included in PSPS consideration when suppression capacity is constrained and Tier 3 PSPS thresholds are met.

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**Table 4-3: Consequence Tier Definitions**

| REU Risk Tier              | CPUC HFTD (Typical) | Cal Fire Threat Zone (Typical) | Description                                                  | Characteristics and Operational Implication                                                                                                                  |
|----------------------------|---------------------|--------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Risk Tier 0: Minimal Risk  | No Tier             | Minimal/ Moderate              | Impacts limited; suppression readily achievable              | Low fuel, good access, limited community exposure. Standard controls are sufficient.                                                                         |
| Risk Tier 1: Elevated Risk | Tier 2              | HFTD                           | Impacts or suppression challenges are present but manageable | Proximity to development, moderate fuel continuity. Enhanced protection settings.                                                                            |
| Risk Tier 2: High Risk     | Tier 3              | VHFTD                          | Good suppression access; proximity to substantial vegetation | Dense fuels, good terrain access, adequate water availability and proximity to fire stations. PSPS is considered when suppression resources are unavailable. |
| Risk Tier 3: Extreme Risk  | Tier 3              | VHFTD                          | Unacceptable consequence regardless of suppression           | Multiple high-risk factors. PSPS may be warranted under extreme conditions.                                                                                  |

### 4.1.5 Operating States, Consequence Tiers, and Operational Response

The four risk drivers combine to produce REU's complete risk picture. Risk Driver 1 (Ignition Probability) identifies when wind speeds make faults likely. Risk Driver 2 (Ignition Pathways) identifies where those faults could transition to wildfires. Risk Driver 3 (Risk Timing & Escalation) determines when fire weather conditions are severe enough to warrant operational changes. Risk Driver 4 (Consequence & Suppression Feasibility) identifies which circuits pose the highest consequences if ignition occurs. The Operating State framework translates this combined assessment into specific operational actions.

The Operating State framework defines four system postures (OS0 through OS3) triggered by fire potential conditions (FPI' and wind speed thresholds from Risk Driver 3). Within each Operating State, the specific operational actions taken on any circuit depend

## REU 2026 Wildfire Mitigation Plan

on that circuit's Consequence Tier (from Risk Driver 4). The result is a matrix of decisions: FPI/wind conditions determine which Operating State REU enters, and Consequence Tier determines how aggressively REU responds within that state.

Table 4-5 documents this decision matrix, showing how operational response escalates as both fire potential and circuit consequence increase. The progression reflects a fundamental principle: circuits with the highest consequence receive the most aggressive protective actions, but only when fire potential conditions justify them. A Tier 0 circuit remains in normal configuration even during OS2 or OS3 because its low consequence makes de-energization unwarranted. A Tier 3 circuit in OS1 receives enhanced protection (Hotline mode, reclosing disabled) when elevated fire conditions and high consequence require heightened vigilance before PSPS thresholds are reached. A Tier 3 circuit in OS2 or OS3 is eligible for PSPS de-energization because the combination of extreme fire potential and extreme consequence makes de-energization the appropriate risk mitigation action.

This integrated framework ensures that REU's operational response is proportional, defensible, and focused on the circuits where risk is actually concentrated.

Table 4-5: Operational Response by Operating State and Consequence Tier

| Operating State          | Risk Tier 0                                  | Risk Tier 1                                                             | Risk Tier 2                                                                             | Risk Tier 3                                                                                      |
|--------------------------|----------------------------------------------|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| OS0 – Normal Operations  | Normal - No change to circuit configuration. | Normal - No change to circuit configuration.                            | Normal - No change to circuit configuration.                                            | Normal - No change to circuit configuration.                                                     |
| OS1 - Elevated Fire Risk | Normal - No change to circuit configuration. | Recloser - Reclosing disabled at the substation. Field work restricted. | Recloser - Reclosing disabled at the substation. Field work restricted.                 | Hotline - Reclosing disabled and enhanced protection enabled at the substation breaker.          |
| OS2 - Extreme Fire Risk  | Normal - No change to circuit configuration. | Recloser - Reclosing disabled at the substation. Field work restricted. | Hotline - Reclosing disabled and enhanced protection enabled at the substation breaker. | Hotline (PSPS) - Portions of Tier 3 circuits de-energized when IC determines threshold exceeded. |

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|                                       |                                              |                                                                         |                                                                                                  |                                                                                                  |
|---------------------------------------|----------------------------------------------|-------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| OS3 - Extreme + Constrained Resources | Normal - No change to circuit configuration. | Recloser - Reclosing disabled at the substation. Field work restricted. | Hotline (PSPS) - Portions of Tier 3 circuits de-energized when IC determines threshold exceeded. | Hotline (PSPS) - Portions of Tier 3 circuits de-energized when IC determines threshold exceeded. |
|---------------------------------------|----------------------------------------------|-------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|

### 4.2 Geographic Risk Profile

Historically, REU relied primarily on the CPUC High Fire-Threat District map to characterize geographic wildfire risk within its service territory. That map remains an important regulatory reference and continues to inform REU's wildfire mitigation planning. In 2024, however, REU and the Redding Fire Department identified additional areas where local conditions suggested greater wildfire consequence and exposure than was reflected in the CPUC map alone. That assessment was based on local knowledge of fuels, terrain, suppression access, and proximity to developed areas.

When CAL FIRE released its updated Fire Hazard Severity Zone map in summer 2025, the areas REU had previously identified as higher concern were generally consistent with the revised hazard designations. For 2025 planning purposes, this reinforced REU's assessment that CAL FIRE Fire Hazard Severity Zone mapping, together with local operational knowledge, provided a useful supplemental input for evaluating wildfire hazard and consequence within the REU service territory. CPUC High Fire-Threat District designations remained an important regulatory reference and continued to inform REU's wildfire mitigation planning.

Looking ahead, REU intends to use multiple complementary sources of wildfire risk information to evaluate wildfire risk across its service territory. REU expects to continue using CPUC HFTD designations as a regulatory backdrop, CAL FIRE Fire Hazard Severity Zone mapping to characterize broader wildfire hazard conditions, and advanced wildfire modeling and localized risk analysis to better understand where utility-caused ignitions could result in the greatest consequences. Together, these tools will support more precise internal prioritization, operational decision-making, and capital planning while maintaining consistency with adopted regulatory frameworks.

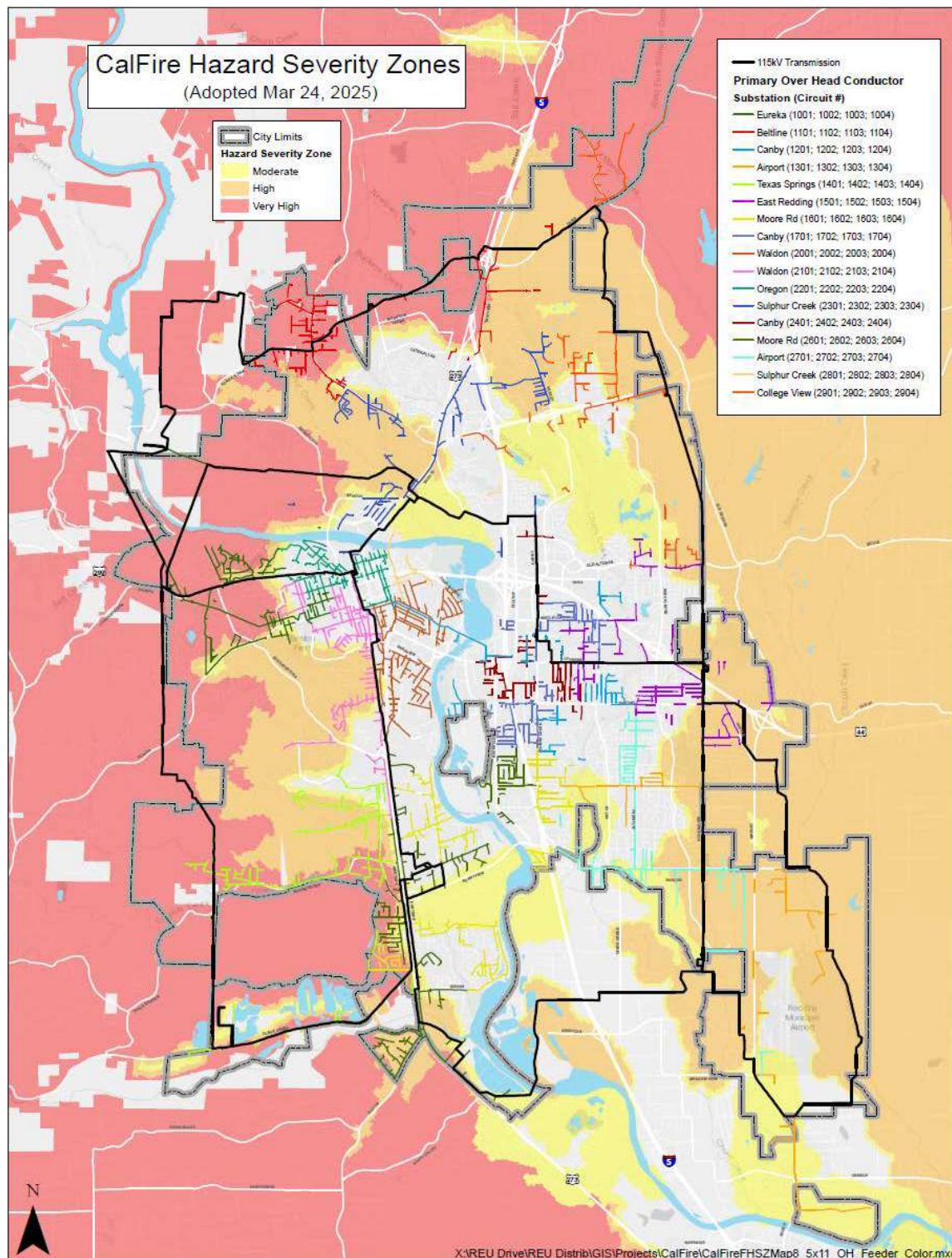


Figure 4-2: CAL FIRE Fire Hazard Severity Zone Map with Overhead Circuit Routing Overlay. REU's service territory showing CAL FIRE moderate, high, and very high fire hazard severity zones overlaid with overhead transmission and distribution circuit routing.

### 4.3 Climate and Weather Risk Drivers

#### 4.3.1 Climate Change

The wildfire risk environment continues to change. Climate change is increasing the likelihood of hotter conditions, more extreme heat, greater hydroclimate volatility, reduced snowpack, and larger wildfire potential across California and Northern California.<sup>3,4</sup> For REU, these trends matter because they can extend the duration of the fire season, accelerate fuel drying, and increase the number of days on which an equipment failure could result in a fast-moving wildfire.<sup>3,4</sup>

REU reviews climate projections for the Sacramento Valley and Redding area through Cal-Adapt and California climate assessment materials as part of its WMP planning cycle. Taken together, these sources point in the same general direction: increasing heat, greater variability, and worsening wildfire conditions over time.<sup>3,4,5</sup>

#### 4.3.2 Temperature

California climate assessments project continued increases in temperature statewide through mid-century and late century.<sup>3</sup> The Sacramento Valley regional assessment provides more localized context, indicating substantial warming during the summer months, particularly in inland areas.<sup>4</sup> Shasta County climate materials similarly project increasing July average temperatures in the North Region over time.<sup>5</sup> These trends are relevant to REU because higher temperatures contribute to fuel drying, longer fire seasons, and more severe fire-weather conditions.<sup>3,4,5</sup>

#### 4.3.3 Extreme Heat

Extreme heat events are expected to worsen sharply in frequency, duration, and geographic extent. The Sacramento Valley regional report projects that under a high-emissions scenario, Sacramento would increase from approximately 4 extreme heat days per year historically to approximately 40 per year by end of century. Cal-Adapt's Extreme Heat tool defines an extreme heat day as a day exceeding the 98th percentile of observed temperatures from 1961–1990 during the April–October period. More frequent and intense heat events accelerate fuel drying and elevate ignition probability throughout the fire season.<sup>3,4,6</sup>

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<sup>3</sup> California Energy Commission, *California's Fourth Climate Change Assessment* (2018).

<sup>4</sup> California Energy Commission, *Sacramento Valley Region Report*, California's Fourth Climate Change Assessment (2018).

<sup>5</sup> California Department of Public Health, *Climate Change and Health Profile Report: Shasta County* (2017).

<sup>6</sup> Cal-Adapt, *Extreme Heat Tool / Methodology*.

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### **4.3.4 Precipitation and Hydroclimate Volatility**

Average annual precipitation may remain relatively stable, while precipitation patterns are projected to become more variable.<sup>4</sup> The Sacramento Valley regional assessment indicates that Northern California is expected to experience greater swings between dry and wet conditions, including more pronounced drought-to-deluge variability.<sup>4</sup> For REU, that means planning for stronger shifts between prolonged dry periods that increase fuel stress and wetter periods that increase vegetation growth and ladder fuel loading.

### **4.3.5 Snowpack and Runoff**

California climate assessments project meaningful declines in mountain snowpack over time, with corresponding changes in runoff timing and seasonal soil moisture.<sup>3</sup> Shasta County climate materials similarly indicate major reductions in March snowpack by late century in the North Region.<sup>5</sup> Earlier and reduced snowmelt runoff can contribute to drier late-spring and summer conditions, which in turn affect vegetation dryness and fire behavior.<sup>3,5</sup>

### **4.3.6 Wildfire Area and Fire Frequency**

California climate assessments project increasing wildfire activity under future warming scenarios, including increases in average area burned and the frequency of very large fires.<sup>3</sup> Shasta County climate materials also indicate substantial long-term increases in wildfire risk, and REU uses those county-level multipliers solely as directional context.<sup>5</sup> The overall implication for REU is a continuing increase in the probability of large, fast-moving fires affecting or threatening the service territory.<sup>3,5</sup>

### **4.3.7 Wind Patterns**

REU considers regional fire-planning information applicable to the Redding area, including the Shasta-Trinity Unit Fire Plan battalion planning context, together with local operational experience and REU's own risk-analysis framework in characterizing prevailing wind conditions. In the greater Redding area, seasonal wind patterns vary over the course of the fire season. Under typical summer conditions, afternoon winds are commonly from the south or southwest, with terrain- and drainage-influenced upslope and up-canyon flow. North and northeast wind events also occur and can strengthen after dark while maintaining lower relative humidity, creating conditions that can support more rapid fire spread and higher consequence.<sup>7</sup>

Real-time and forecast wind data are integrated into REU's Operational Decision Support system through the Fire Potential Index (FPI'), which combines the Energy Release Component (ERC) and Burning Index (BI) from the National Fire Danger Rating System. Wind-speed thresholds derived from this analysis govern Operating State transitions. As wind speeds increase, the probability that any given equipment fault will produce a

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<sup>7</sup> CAL FIRE, *Shasta-Trinity Unit 2025 Fire Plan*, May 7, 2025

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sustained arc and potential ignition increases, driving escalation from Normal to Recloser to Hotline operating state. These thresholds are documented in Section 5.3.

### 4.3.8 How Climate Risk Informs Planning

REU recognizes that climate change is increasing long-term wildfire risk across its service territory by extending fire seasons, worsening fuel conditions, and increasing the frequency and severity of fire weather. In the near term, REU continues to rely on operational programs to reduce risk, including vegetation management, inspection, situational awareness, and operational controls. Those measures remain necessary, but they rely on continuous maintenance and repeated intervention.

Climate risk therefore also informs REU's capital planning. As conditions worsen over time, REU intends to increase the use of capital measures that materially reduce or eliminate risk while continuing appropriate operational controls. These measures may include overhead-to-underground conversion, covered conductor where appropriate, and other system hardening investments. The long-term objective is to adapt the system to a more severe wildfire environment by shifting targeted portions of the portfolio from ongoing operational risk management to structural risk reduction.

## 4.4 Risk Driver to Program Traceability

**Table 4-6: Risk Driver to Program Traceability**

| Risk Driver                    | Programs Addressed                     | How the Connection Works                                                                  |
|--------------------------------|----------------------------------------|-------------------------------------------------------------------------------------------|
| Driver 1: Ignition Probability | 5.2 Inspection; 5.3 T&D Ops; 6 Capital | Inspection prioritization; wind-based OS thresholds; hardening of high-fault segments     |
| Driver 2: Ignition Pathways    | 5.1 VM; 6.3 Pole Wrap; 7 Technology    | VM targeting and clearance; fuels reduction; hazard tree prioritization; camera placement |
| Driver 3: Risk Timing          | 5.3 T&D Ops; 7.1 ODS; 8.2 PSPS         | OS determination; 7-day outlook; PSPS trigger evaluation; patrol posture changes          |
| Driver 4: Consequence          | 6 Capital; 8.2 PSPS; 8.4 Emergency     | Capital prioritization; PSPS circuit selection; restoration priority sequencing           |

# 5 Operational Risk Reduction Programs

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Three programs form the operational core of REU's wildfire risk management system. Together, they keep REU's infrastructure in a fire-safe state year-round through systematic vegetation clearance, equipment inspection and repair, and operating posture changes that reduce ignition risk when weather is most severe. All three are driven by the risk intelligence described in Section 4.

## 5.1 Vegetation Management Program

Vegetation in contact with or near energized conductors is a significant pathway for utility-related wildfire ignitions. REU's Vegetation Management Program reduces this risk through a comprehensive, risk-driven inspection and clearance system that operates year-round. The program also reduces fire spread potential by maintaining defensible space at pole bases and clearing combustible fuels in surrounding terrain. These activities create firebreaks and limit the fuel continuity that could allow an ignition to develop into a spreading wildfire.

The program is inspection-led and risk-driven: detailed arborist assessments identify vegetation threats, classify them by urgency, and drive all downstream clearance and fuels reduction work. A two-phase annual cycle ensures that REU identifies threats in a timely manner and addresses regrowth during peak vegetation activity. All work is performed to CPUC General Order 95 standards, ISA/ANSI arboricultural best practices, and REU-specific standards that often exceed regulatory minimums, particularly in Tier 2 and Tier 3 fire threat areas.

### 5.1.1 Two-Phase Annual Inspection Cycle

**Phase 1: Annual System Inspection (September 1 through December 31).** Certified Arborists and Registered Professional Foresters conduct 100% systemwide visual inspections of all overhead distribution and transmission facilities. Using TRAQ principles and Level 1/Level 2 visual inspection protocols, inspectors evaluate vegetation proximity and failure potential, with results incorporated into REU's wildfire-risk prioritization and mitigation process. All inspection data is captured electronically in REU's ESRI-based GIS Field Map application with required fields, geospatial location, photographic evidence where applicable, and priority classification.

The September-December timing aligns with the end of the annual growth cycle and positions REU to identify conditions before fire season and address them during pre-season work windows. This is when vegetation has completed its annual growth and conditions stabilize, allowing for the most accurate assessment of what will persist through the fire season.

**Phase 2: Mid-Year Cycle Buster (May 1 through June 30).** A targeted reinspection of Tier 2/3 circuits is conducted during the period of accelerated spring/early summer

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growth. This phase verifies that previously cleared spans remain compliant, identifies vegetation regrowth that may require additional mitigation, and catches any new conditions requiring immediate action. The May-June timing targets the window when vegetation is growing most rapidly but before mid-summer conditions stabilize. This proactive approach catches emerging threats early, reducing the number of reactive P1 conditions that would otherwise accumulate during fire season.

Together, the two-phase cycle improves early risk identification and seasonal validation while minimizing reactive mitigation during critical fire season periods.

### Inspection Methodology and Priority Classification

Inspections are performed by Certified Arborists or Registered Professional Foresters trained in tree risk assessment and local vegetation characteristics. All inspections follow TRAQ principles, ISA/ANSI standards (Levels 1 and Level 2 protocols), CPUC GO 95 Rule 35, and REU specified methods and standards for clearance. Each tree or vegetation condition observed is assigned a priority classification:

- **Priority 1 (P1): Immediate Action (72 hours).** Vegetation is actively violating required clearance, showing signs of burning, in direct contact, or presenting immediate fall-in risk. P1 conditions are corrected within 72 hours and are tracked through completion.
- **Priority 2 (P2): Monitor Closely.** Vegetation remains outside required clearance and is approaching the clearance limit, with likely noncompliance before the next inspection cycle. P2 conditions are scheduled for mitigation during routine work cycles.
- **Priority 3 (P3): Routine Monitoring.** Well outside clearance requirements and posing no immediate risk. P3 conditions are monitored during future inspection cycles.
- **Facility Protection (FP):** Dead, dying, diseased, or structurally compromised trees with sufficient height and failure potential to strike overhead facilities. FP trees are evaluated for removal or intensive hazard mitigation.

All inspection data is recorded at the pole-to-pole span level with additional detail where vegetation conditions vary. The tablet-based inspection application provides direct input into the permanent backend database. The database allows management to review records, provides web-based dashboarding, and granular compliance evidence for regulatory defensibility and work planning. Figure 5-1 and 5-2 show the field data collection tool and management dashboard, respectively.

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2:19 PM Wed Apr 1

Vegetation Inspections Prod Offline

GPS accuracy 22.4 ft

P2: The risk level is moderate to high

40.579975°N 122.375920°W 5.6 mi

Edit Copy Attribut... More

Inspected By  
Miles Schneider

Inspect Date  
12/3/2025, 4:46 PM

Pole Number  
J30205

Address Number  
540

Street Name  
SOUTH ST

Quantity  
1

Species  
Pistache

Status  
P2: The risk level is moderate to high

ServiceDrop  
NO

Work Required  
Yes

LA  
YES

CA  
NO

Comments  
--

Removal Approved  
--

Tree Remarks

Figure 5-1: Vegetation Field Inspection Form. Screenshot of a mobile vegetation inspection form showing a map of inspection points near the Sacramento River and a selected vegetation risk record with inspection details, species, status, and work requirements.

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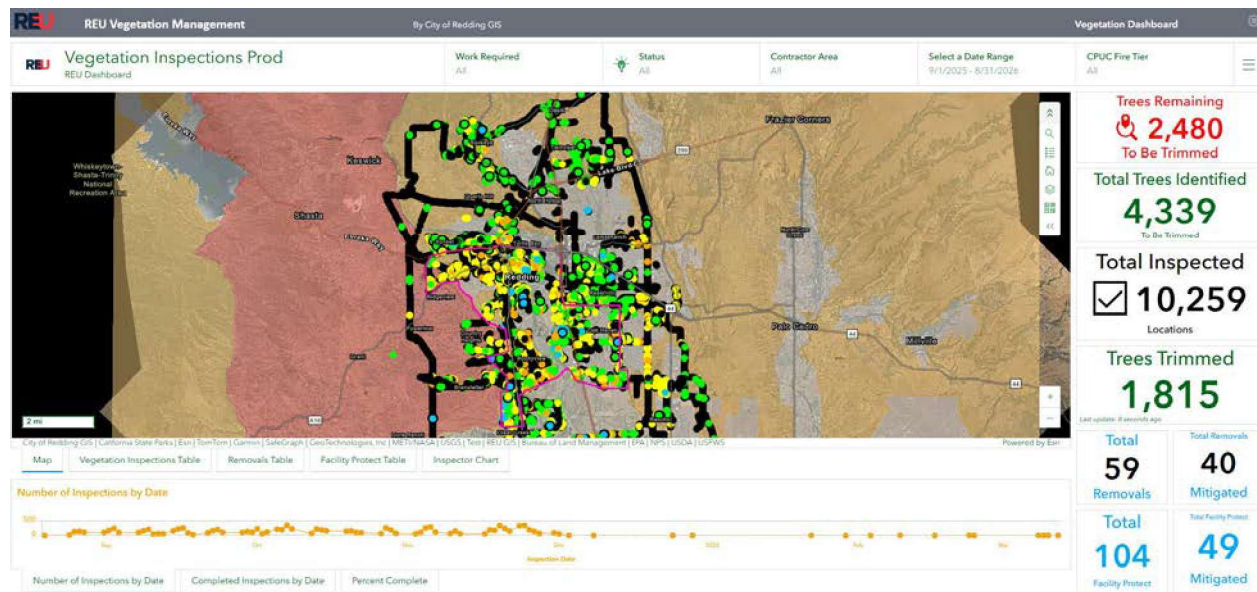


Figure 5-2: Vegetation Management Dashboard. Screenshot of the REU vegetation management dashboard showing mapped inspection locations, fire hazard areas, inspection trends, and summary counts for trees remaining, trees identified, inspections completed, and mitigation work.

### 5.1.2 Clearance Standards and Implementation

REU maintains clearance standards that meet or exceed CPUC minimums in fire threat areas:

Table 5-1: Vegetation Clearance Standards

| Conductor Type       | Minimum Clearance                                       | Target in Tier 2/3                                     |
|----------------------|---------------------------------------------------------|--------------------------------------------------------|
| Service conductors   | Mitigate excessive strain, abrasion, or safety concerns | Clear barrel around service conductor (where feasible) |
| Secondary conductors | 2 feet                                                  | 2 feet + enhanced monitoring                           |
| 12 kV primary        | 8 feet                                                  | 12 feet (where feasible)                               |
| 115 kV transmission  | 15 feet                                                 | 30 feet (where feasible)                               |

Priority 1 (P1) violations are addressed within 72 hours by internal tree crews or qualified contract line-clearance arborists. Routine work follows an annual cycle with pre-season completion of Tier 2/3 circuits where feasible. All pruning follows ISA best practices and ANSI standards, emphasizing natural pruning techniques, directional pruning to guide

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regrowth away from conductors, and removal of dead or failing limbs. Damaging practices (flush cuts, stubbing) are prohibited.

Work is performed in compliance with Cal/OSHA standards, including qualified personnel, defined minimum approach distances, and procedures for de-energization when required. Crews are also authorized to address vegetation encountered in the field that meets non-compliance criteria, even without a prior inspection record these trees are mitigated at discovery and subsequently documented.

### **5.1.3 Ground Base and Pole Clearance**

REU maintains a 10-foot cleared zone around select utility poles consistent with PRC 4292 requirements. Ground base clearance removes combustible vegetation and debris from the immediate vicinity of poles and associated equipment, reducing the fuel continuity that would allow an ignition at the pole base to transition into ground-level fire spread. This is particularly important in high-consequence Tier 2/3 areas where dense fuels surround the infrastructure. Figure 5-3 shows a before-and-after image of a 115 kV transmission right-of-way.



*Figure 5-3: Before and After Image of Cleared 115 kV Right of Way. Side-by-side photos of a 115 kV transmission right-of-way before and after vegetation clearance, showing dense vegetation near utility poles on the left and cleared ground around the poles on the right.*

### 5.1.4 Targeted Fuels Reduction and Managed Grazing

Beyond direct line clearance, REU conducts targeted fuels reduction on REU-managed sites and adjacent Wildland-Urban Interface (WUI) areas in partnership with the City of Redding. Treatment methods include mechanical mastication, chemical application, hand crews, and managed grazing. Fuel reduction work is sequenced to address corridor-level regrowth patterns identified through inspection data.

Managed goat grazing is used in large terrain-constrained areas where mechanical access is limited or where landscape-level fuel reduction is desired. Grazing promotes defensible space and reduces fuel continuity across larger areas, supporting the objective of creating firebreaks and limiting the spread potential of ignitions that do occur.

Invasive grass management, including mechanical mastication, targeted chemical application, and hand treatments, is coordinated with the City of Redding Parks Department and addresses invasive species that promote fire spread regardless of proximity to REU facilities. Citywide invasive grass reduction supports REU's landscape-level fire mitigation objectives and community resilience, including in areas outside the immediate vicinity of REU lines.



*Figure 5-4: Redding Police Officer Performing Traffic Control for Ground Clearance Goats. A large herd of goats is moving across a street while a Redding police vehicle and personnel provide traffic control for managed grazing used in ground clearance work.*

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### 5.1.5 Quality Assurance and Corrective Action

REU maintains a formal QA/QC framework ensuring inspection accuracy and regulatory compliance. QA is established through qualified inspectors, standardized TRAQ-based protocols, electronic data collection with mandatory fields, and training on data entry standards. QC is implemented through field and desk audits (reviewing priority classifications and photographic evidence), targeted reinspection of P1 findings, immediate hazard escalation for P1 conditions, and data integrity checks.

When quality issues are identified, REU applies structured corrective action, including correction of records, focused retraining, reinspection, and crew feedback integration. Inspection data is analyzed over time to identify recurring P1 locations, regrowth patterns, and the effectiveness of prior mitigation actions. As conditions evolve, REU updates inspection guidance, training, and QA/QC criteria accordingly.

## 5.2 Asset Inspection Program

Electric infrastructure deteriorates continuously. Poles age and lose mechanical strength. Hardware corrodes and loosens. Insulators develop cracks from thermal cycling and contamination. Conductors and connections degrade. Many of these conditions gradually increase fault probability over months or years until an external stressor triggers a sudden equipment failure. REU's Inspection Program finds these conditions before they cause outages or ignitions by systematically surveying the distribution system, documenting every deficiency, and driving corrective action on a risk-prioritized timeline.

The program's primary purpose is to locate defects, characterize their severity, and ensure they are corrected within timelines proportional to risk. Wildfire risk management is integrated through prioritization. Conditions located in Tier 2 and Tier 3 High Fire-Threat Districts receive elevated response requirements under GO 95 Rule 18. The program directly supports Risk Driver 1 by reducing the probability that equipment degradation will produce a fault capable of igniting vegetation.

### 5.2.1 Inspection Types and Coverage

REU conducts three types of inspections on defined cycles, as required by CPUC General Order 165. All inspections are performed by REU Journeyman Linemen who are qualified by training and experience to recognize electrical system defects, wildfire ignition hazards, and non-compliant construction.

- **Patrol Inspections:** Annual visual survey of all applicable overhead and underground facilities, conducted from the ground or from vehicles. Patrol inspections identify obvious defects, deterioration, clearance violations, and visible hazards: the first systematic pass at current system condition. Coverage is 100% of applicable locations, completed annually.
- **Detailed Inspections:** Closer visual and tactile assessment of poles, crossarms, conductors, hardware, and connections, performed on defined multi-year cycles. Detailed inspections reveal conditions that patrol may miss such as cracked crossarms, poletop decay, and leaking transformers.

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- **Intrusive Inspections:** Ground-line excavation and direct assessment of pole condition below grade, where decay most commonly originates. Intrusive inspections provide the only reliable assessment of structural integrity for wood poles and are performed on defined multi-year intervals.

### 5.2.2 Prioritization: GO 95 Rule 18 and the P-Level System

Every identified defect is assigned a priority level using REU's P-level condition rating system, which implements GO 95 Rule 18 corrective action requirements. The P-level reflects condition severity and is independent of location. Fire-threat tier affects the required response window. Rule 18, Level 2, has three different ceilings depending on the condition type and location. When a defect meets multiple criteria, the most conservative P-level governs.

**Table 5.2-1. P-Level Classification and Required Response Windows**

| Priority Level | Condition Severity                                                               | Required Response                                                                                    |
|----------------|----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
| P1: Emergency  | Immediate safety hazard; evidence of ignition or credible imminent ignition risk | ≤ 72 hours (or sooner if hazard controls require)                                                    |
| P2: High       | High-risk condition requiring near-term correction                               | ≤ 6 months                                                                                           |
| P3: Medium     | Moderate-risk condition                                                          | ≤ 12 months<br>(fire risk in Tier 2 HFTD, or worker safety)<br>≤ 36 months<br>(all other conditions) |
| P4: Low        | Low-risk condition                                                               | ≤ 36 months                                                                                          |
| P5: Monitor    | No maintenance required at this time; monitor for changes                        | Reevaluate at next inspection cycle                                                                  |

### 5.2.3 Closed-Loop Workflow

The program follows a structured workflow from scheduling through verified closeout. Inspections are scheduled based on GO 165 cycle requirements, Tier 2/3 fire-threat exposure, asset criticality, and operational constraints, with higher-risk areas sequenced first. REU Journeyman Linemen conduct field inspections, document defects with photographs and location data, and assign a preliminary P-level. The Electric Program Supervisor reviews all identified defects, validates fire-risk classification and priority, and establishes required corrective action timelines. Approved work is then planned and executed by REU line crews. Upon completion, corrective actions are verified and the defect record is formally closed out in REU's GIS inspection portal and Lifecycle database, maintaining full traceability from identification through correction.

### **5.2.4 Documentation and Data Systems**

REU maintains three integrated systems to support inspection quality, traceability, and corrective action management. The tablet-based inspection program is the field job aid that supports consistent data collection and quality in the field. The REU GIS Inspection Database is the system of record for defect documentation and geospatial inspection history. The Life Cycle Database is used to assign, track, and manage corrective work, whether the item requires a formal work order or can be completed directly by field crews. Figure 5-5 shows one example of the tablet-based field data collection form for poles.

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Field Maps 2:55 PM Wed Apr 1

REU Pole Inspection

**Defects**

|                                                  |                                                             |                                                          |
|--------------------------------------------------|-------------------------------------------------------------|----------------------------------------------------------|
| Original Inspection Type<br>Intrusive Inspection | Last Inspection Type<br>Intrusive Inspection                | Original Inspector<br>drewm_redding                      |
| Last Inspector<br>skincaid                       | Original Inspect Date<br>Monday, August 11, 2025<br>2:56 PM | Last Inspect Date<br>Wednesday, April 1, 2026<br>2:54 PM |
| Component *<br>Pole - Wood                       | Condition *<br>Poletop Decay                                | Original Rating<br>3                                     |

Current Intrusive Wood Pole Rating \*

| Condition Rating | Maintenance Priority                                                 | Wood Pole Intrusive Inspection                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                | Emergency Level I (72 hrs)                                           | Any pole that poses an immediate threat to public safety or is a reliability hazard shall be replaced via the confirming work order process                                                                                                                                                                                                                                                                           |
| 2                | High Priority Level II (6 Months)                                    | Tier 3 HFTD Poles that pose a moderate impact to safety with RSM <=67%. Work orders shall be created within 2 months of inspection date                                                                                                                                                                                                                                                                               |
| 3                | Medium Priority Level II (12 Months)                                 | Tier 2 HFTD Poles that pose a moderate impact to safety with RSM <= 67% and/or any pole with <=30%. Work order shall be created within 6 months of inspection date.                                                                                                                                                                                                                                                   |
| 4                | Low Priority Level II (36 Months)                                    | Any Zone 1 pole with >30% and <=67% RSM. Work order will be created within 12 months of inspection date for poles >30% and <=50%. Poles with >50% and <=67% shall receive an engineering evaluation within 24 months of reporting and should evaluation determine the pole has the appropriate safety factors to remain in service the rating shall be moved to a Priority 5; else pole is to be replaced/reinforced. |
| 5                | No Maintenance Required Level III (Reevaluate Next Inspection Cycle) | All poles with >67% RSM or any Zone 1 poles with >50% and <=67% RSM where engineering evaluation has determined that structure has appropriate Safety Factor levels.                                                                                                                                                                                                                                                  |

|                                                                                              |                                      |                                                                                                                        |
|----------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| Location<br>Top                                                                              | Cause<br>Normal wear                 | Recommended Action *<br>What to do about the Component (Pole - Wood),<br>Not the Condition (Poletop Decay).<br>Replace |
| Defect Status *<br><input checked="" type="radio"/> Created <input type="radio"/> In Process | Due Date<br>Tuesday, August 11, 2026 |                                                                                                                        |

✓

Figure 5-5: Example Asset Inspection Field Data Collection Form. Screenshot of a mobile REU pole inspection form showing defect information, pole condition rating, maintenance priority levels, and recommended corrective action for a wood pole inspection.

### 5.3 T&D System Operational Practices

Vegetation management and inspection programs reduce ignition risk by maintaining clearances and identifying equipment defects before they fail. But when fire weather conditions become extreme, the likelihood and consequences of any fault may be greater, regardless of how well-maintained the system is. The T&D System Operational Practices program manages this residual risk by changing how REU operates its system in real time during elevated fire weather conditions.

When Operational Decision Support (ODS) forecasts an elevated risk window and conditions meet Risk Framework thresholds, REU system operators must reconfigure the system and lead field crews through a defined set of actions covering the period before conditions arrive, the event itself, and restoration once conditions improve. This program governs all of that work: the protection configuration changes, the patrol posture, the switching execution, and the de-energization decisions that collectively minimize the risk that REU's system contributes to a wildfire during the periods when that risk is highest.

#### 5.3.1 Operating State Framework

REU uses four defined Operating States (OS0–OS3) to translate fire weather conditions into a prescribed operational posture. The Operating State definitions, trigger thresholds, and FPI'/wind criteria are established in the Risk Framework and summarized in Section 4.1.5 (Table 4-5). Operating State determination is made hourly during fire season based on FPI', wind forecasts, and NWS warnings provided by ODS. OS1 may be declared by the system operator on shift, OS2 and OS3 require Incident Commander authorization. All transitions are timestamped and logged in the Control Room Log.

#### 5.3.2 Protection Configuration Management

The specific protection configuration applied to each circuit at each Operating State is defined in Table 4-5. As conditions escalate, REU applies an increasingly protective set of measures that build on each other.

At OS1, automatic reclosing is disabled at the substation on all Tier 2 and Tier 3 overhead circuits. Under normal operating conditions, automatic reclosers attempt to restore service after a fault. During elevated fire weather, an automatic reclose can re-energize a fault against vegetation or a downed conductor that the initial trip may have cleared momentarily, and that second energization under extreme conditions can be sufficient to ignite a wildfire. Disabling automatic reclosing eliminates this risk and is one of the highest-value, lowest-cost wildfire risk reduction measures.

On higher-consequence circuits, hotline mode is also applied at the substation breaker. Hotline mode tightens protection settings so the breaker trips faster and with fewer cycles than under normal settings. Because the settings are applied at the breaker level, hotline mode affects the entire circuit. This reduces the arc energy released during a fault event. Because arc energy is proportional to ignition potential, a faster, lower-energy trip is less likely to produce a spark capable of starting a fire.

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At OS2 and OS3, all OS1 measures remain active and PSPS is additive. When the Incident Commander determines that continued energization of a circuit segment is indefensible given fire weather conditions, consequence tier, and suppression resource availability, REU de-energizes targeted segments through manual field switching. Because distribution circuits cannot be isolated and sectionalized through SCADA, crews physically operate switches in the field from pre-built switching orders. The result is that any de-energized segment sits adjacent to a system already operating in its most protective configuration.

### 5.3.3 Readiness and Standing Switch Logs

PSPS execution under time pressure is operationally complex as operators must safely work with field crews to isolate circuit segments in the correct sequence without introducing new hazards. REU prepares for this effort by maintaining a standing switch log: a set of pre-built switching orders covering all PSPS-eligible circuit segments, maintained year-round so that the bulk of the switch order is prepared well in advance of an OS 2/3 event.

**Table 5.3-1. Standing Switch Log - Lifecycle**

| Activity                        | Description                                                                                                                                                                                                                                                                                                           |
|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Standing Switch Log Development | Pre-built switching orders covering all PSPS-eligible circuit segments. Each switching order documents the exact sequence of switching actions required to safely de-energize and re-energize a segment, including isolation points, clearance points, and restoration sequence assuming normal system configuration. |
| Pre-Season Verification         |                                                                                                                                                                                                                                                                                                                       |

Before each fire season, the Operations Supervisor reviews all standing switch orders for consistency with the current system configuration. Changes since the last verification, including outages, construction, or reconfiguration, require switch order revision before the season opens. Verified orders are signed off and recorded.

|                                     |                                                                                                                                                                                                                                             |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Pre-Event Verification (each event) | Before patrol posture is activated for any OS2/OS3 event, switching order currency is re-verified against current system configuration. If system state has changed since last verification, orders are updated before activation proceeds. |
| Execution                           | When PSPS is authorized, System Control Operators execute pre-built switching orders in the approved sequence. Operators record each switching action with timestamp.                                                                       |
| Post-Event Restoration              | Pre-built restoration orders govern re-energization sequence. Re-energization begins after post-event patrol has cleared affected                                                                                                           |

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|  |                                                                 |
|--|-----------------------------------------------------------------|
|  | segments and the Incident Commander has authorized restoration. |
|--|-----------------------------------------------------------------|

The standing switch log was validated through the 2025 fire season.

### 5.3.4 PSPS Sequence

PSPS is a last-resort mitigation applied when the combination of fire weather conditions, consequence tier, and suppression resource availability makes continued energization of a circuit segment indefensible. The threshold criteria and circuit eligibility logic are established in the Risk Framework (Tables 4-2 and 4-5). This section describes the execution and governance sequence.

**Table 5.3-2. PSPS Sequence**

| Stage                        | Typical hours relative to PSPS initiation | Description                                                                                                                                                                                                         |
|------------------------------|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Threshold Evaluation      | 168 hours                                 | ODS confirms forecasted FPI' and wind conditions meet or exceed PSPS threshold criteria (see Table 4-2). Consequence and suppression feasibility criteria evaluated for affected segments per Table 4-5.            |
| 2. Incident Commander Review | 96 hours                                  | Incident Commander reviews the forecasted threshold status, segment consequence tier, suppression resource availability, and customer impact.                                                                       |
| 3. Customer Notification     | 72 hours                                  | Customer Service & Communications executes the pre-notification sequence for affected customers.                                                                                                                    |
| 4. Switching Execution       | 2 hours                                   | System Control Operators execute pre-built switching orders in the approved sequence. De-energization is sequenced by segment per the approved switching plan. Each switching action is logged.                     |
| 5. IC-Authorized Restoration | All clear                                 | IC authorizes restoration only after patrol verification is complete and all findings are resolved. Re-energization proceeds per pre-built restoration orders. Customer Service manages restoration communications. |
| 6. After-Action Review       | One week after restoration                | Every PSPS event triggers a structured after-action review. Findings are documented and integrated into the following season's plan and controlled technical document updates as appropriate.                       |

### 5.3.5 Annual Readiness and Continuous Improvement

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- Before each fire season, the Operations Supervisor verifies currency of all standing switch orders against current system configuration, confirms crew training completion, and reviews any threshold updates issued through the controlled technical document process. An annual drill exercises OS2/OS3 response workflows under simulated conditions to validate crew proficiency before an actual event.
- After-action reviews are completed for every OS2 and OS3 event and every PSPS activation. Findings are integrated into the following season's plan and, where threshold or configuration changes are warranted, into controlled technical document updates.
- A post-season program review assesses overall readiness performance, documents lessons learned, and identifies improvements for the coming year.

## 6 Capital Risk Reduction Programs

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Operational programs continuously manage risk through recurring fieldwork and operational changes. Capital programs permanently change the system's risk profile. Where operational programs respond to current conditions and current weather, capital programs eliminate or reduce the sources of risk so that future operational programs have less to manage. The investments compound over time: each retrofitted pole, each converted circuit, each wrapped structure reduces the baseline risk load that crews and operators must manage during every fire season going forward.

REU's capital risk reduction portfolio consists of three programs, each addressing a different dimension of infrastructure-based risk: the System Hardening Program targets ignition risk at the pole-top equipment level; the Fire Mitigation System Upgrades Program addresses larger-scale circuit-level interventions, including relay and protection upgrades, covered conductor, and targeted undergrounding; and the Fire-Retardant Pole Wrap Program protects pole structures from damage if a wildfire reaches REU infrastructure. All three programs are prioritized using Risk Framework outputs and Inspection Program findings.

### 6.1 System Hardening Program

The System Hardening Program reduces wildfire ignition risk at the individual asset level by retrofitting pole-top equipment in Tier 2 and Tier 3 fire threat areas and in Wildland-Urban Interface locations. Hardening investments provide persistent, year-round risk reduction independent of crew intervention or system configuration changes.

The program targets the conditions that appear most frequently in REU's Inspection Program findings and historical ignition record: arc events at pole-top equipment and wildlife contact with energized conductors. Candidate locations are identified by combining Wildfire Risk Framework consequence tier designations with documented deficiency patterns. Locations with elevated ignition pathway risk and potential consequence receive the highest priority.

#### 6.1.1 Pole-Top Hardening and Retrofits

REU installs three classes of ignition-mitigating components at targeted pole-top locations:

**Table 6-1. Pole-Top Hardening Components**

## REU 2026 Wildfire Mitigation Plan

| Component                               | Risk Addressed                                        | How It Reduces Ignition Probability                                                                        |
|-----------------------------------------|-------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| Non-expulsion fuses                     | Equipment arcing during fault events                  | Reduces fault energy available to ignite; limits arc duration and plasma temperature at the fault location |
| Wildlife protection covers and barriers | Animal contact with energized conductors or equipment | Eliminates the contact pathway that causes phase-to-ground and phase-to-phase faults from wildlife         |
| Surge arresters                         | Overvoltage transients causing insulation failure     | Limits peak transient voltage, preventing insulation puncture events that can produce sustained arcing     |

CalTrans permitting and switching complexity are the primary scheduling constraints for this initiative. Locations within state rights-of-way require encroachment permits with lead times that must be initiated early in the annual planning cycle. Substation getaway locations require extensive switching coordination and are targeted for execution during planned substation outages where possible. Seasonal wetland access limitations affect a subset of locations and are managed through advance scheduling during dry months.

## 6.2 Fire Mitigation System Upgrades Program

The Fire Mitigation System Upgrades Program provides the engineering framework for larger-scale, circuit-level capital interventions that go beyond pole-top retrofits. The program evaluates each identified high-risk circuit segment and determines the most appropriate mitigation strategy based on the circuit's risk tier designation, ignition pathway characteristics, and operational constraints.

The 2025 program year was an initial evaluation phase. REU focused on understanding the range of available mitigation strategies, building preliminary decision criteria, and evaluating options in the context of the updated Wildfire Risk Framework. No large-scale capital deployments were executed in 2025. Specific target locations, project sequencing, and annual deployment commitments are established through the annual work plan in Part II.

As this program matures, REU is developing an engineering decision framework to guide capital investment decisions at the circuit-segment level. Capital upgrades under this program serve two complementary purposes. Direct risk elimination includes investments that physically remove or reduce ignition pathways regardless of weather conditions or operational posture, such as covered conductor, targeted undergrounding, and relay and protection upgrades. Operational enablement includes investments that improve the speed, reliability, and precision of operational risk controls during elevated fire weather, such as SCADA-controlled switching, field reclosers, and sectionalizing improvements that reduce the customer impact of targeted de-energization. Many investments serve both purposes.

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The mitigation strategies REU is evaluating under this program include relay and protection upgrades, covered conductor conversion, targeted underground conversion, field recloser installation, and SCADA-controlled switching infrastructure. Strategy selection for each circuit segment will be driven by Risk Framework tier designations and refined through the engineering decision framework currently under development.

### **6.3 Fire-Retardant Pole Wrap Program**

The Fire-Retardant Intumescent Pole Wrap Program protects REU's distribution and transmission infrastructure from wildfire damage regardless of the ignition source. Other capital programs reduce ignition probability, while pole wrap improves asset survivability by protecting wood poles from direct flame contact and radiant heat. This protection helps infrastructure remain intact during and after a fire, reduces post-fire restoration work, and supports faster service restoration.

REU uses Stella Jones fire-retardant intumescent wrap material, which activates under heat exposure to form an insulating char layer that protects the wood pole base from sustained flame and radiant heat. Wrapping is concentrated on transmission and distribution poles in CPUC Tier 2 and Tier 3 areas, with targeted expansion to distribution poles within a 200-foot buffer into Tier 2 zones adjacent to Tier 3. Poles in low-risk urban environments such as irrigated lawns, paved surfaces, and maintained landscaping, are exempt from wrapping requirements.

REU conducts biennial condition inspections of all wrapped poles to identify damage from birds, rodents, or mechanical equipment and execute patch repairs or full re-wraps where needed. GIS Field Maps track each pole's wrap installation date, condition, and maintenance history.

The 2025 inspection cycle completed assessment of all 1,374 identified poles, applying exemption criteria and reducing the target population by 123 poles to a revised total of 1,251 poles requiring wraps.

## 7 Situational Awareness and Technology

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Mitigation programs reduce risk through sustained field work and capital investment. During elevated fire weather, advance situational awareness supports timely preparation and a coordinated response. Section 7 describes how REU builds and maintains that situational awareness: the analytical program that converts fire weather data into forward-looking operational guidance, the technology infrastructure that supports real-time visibility before, during, and after elevated events, and the data-sharing relationships that extend that awareness to partner agencies.

### 7.1 Operational Decision Support Program

The Operational Decision Support (ODS) Program is the analytical core of REU's situational awareness capability. It converts authoritative fire weather data and Risk Framework outputs into standardized, forward-looking decision-support products that enable leadership, Operations, and the Emergency Operations Center (EOC) to anticipate elevated wildfire risk and prepare before conditions arrive.

ODS is intentionally advisory. Operational actions, system control, and command authority remain with authorized personnel and established procedures. Its purpose is to improve the quality, timeliness, and consistency of operational decisions by providing a structured, hourly assessment of anticipated fire weather conditions and likely Operating State implications over a rolling multi-day horizon. ODS enables REU to move from reactive response to proactive readiness, identifying escalation windows and anticipated transitions far enough in advance for crews, operators, and leadership to prepare.

#### 7.1.1 How ODS Works

ODS applies the FPI' and wind-threshold methodology defined in Section 4.1.3 to hourly forecast data and produces a rolling seven-day operational outlook. This section describes how the analysis is executed, delivered, and used.

Framework calculations are executed at hourly resolution to capture the diurnal variability and rapid changes characteristic of fire weather conditions in Redding's geography. The analysis emphasizes trends, persistence, and convergence to identify the escalation and de-escalation windows that matter most for operational readiness.

#### 7.1.2 ODS Decision-Support Products

The ODS Program produces two standardized products, as explained in Table 7-1.

**Table 7-1. ODS Decision-Support Products**

| Product | Primary Audience | Frequency | Content |
|---------|------------------|-----------|---------|
|---------|------------------|-----------|---------|

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|                                      |                             |                                         |                                                                                                                                                                                                                                                                                              |
|--------------------------------------|-----------------------------|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Nightly Wildfire Operational Outlook | Leadership, Operations, EOC | Every morning at approximately 12:00 am | 7-day fire weather forecast includes: National Weather Service warning when applicable; rolling seven-day hourly FPI'/wind outlook; anticipated Operating State trends; escalation and de-escalation windows; periods requiring heightened readiness; forecast uncertainties and limitations |
| Real-Time Operational Dashboard      | EOC staff, Leadership, IC   | Continuous during elevated events       | Real time, 7-day fire weather forecast includes updated FPI'; near-term forecast trends; current Operating State; PSPS status; and current weather station readings from REU's available local weather station network.                                                                      |

The 7-day Nightly Wildfire Operational Outlook drives next-day and near-term readiness discussions across Operations, leadership, and emergency management. It provides the primary input for staffing and resource posture decisions and feeds the 1-to-7-day advance planning window that PSPS notification requirements depend on. The Real-Time Dashboard complements the Outlook during active events by maintaining shared situational awareness across the EOC, leadership, and the Incident Commander throughout an elevated fire weather period by providing hourly updates and current wind and gust measurements.

### 7.1.3 Human-in-the-Loop Design

ODS is designed so that no analytical output can trigger an operational action on its own. Wildfire operational decisions carry consequences for public safety, customer impact, and regulatory accountability that require human judgment, real-time field awareness, and command authority. ODS provides the information authorized decision-makers need to act.

**Table 7-2. Human-in-the-Loop Safeguards**

| Safeguard                       | Implementation                                                                                                                                                                                       |
|---------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Advisory-only outputs           | Advisory-only outputs. ODS products support decisions by authorized personnel; operational direction remains with established command authorities. No ODS output constitutes an operational mandate. |
| No self-executing thresholds    | Forecast exceedances and modeled indices require review and authorization before any Operating State change or PSPS action.                                                                          |
| Explicit authorization required | All Operating State transitions require explicit authorization by a designated individual. Operating State changes require human review and authorization under established procedures.              |
| Judgment over automation        | Human judgment is an intentional and required component of Operating State determination. Real-time conditions, field observations, and professional assessment always take precedence.              |
| IC override authority           | The Incident Commander may disregard ODS-predicted escalation at any time. IC retains full command authority.                                                                                        |

This design protects against automation bias, preserves accountability with designated decision-makers, and ensures that operational decisions reflect the full situational picture.

### 7.1.4 Relationship to Other Programs

ODS sits at the intersection of the Risk Framework and operational execution. The Risk Framework defines what constitutes elevated wildfire risk and establishes the thresholds and escalation logic. ODS executes that framework in real time and delivers its outputs to the people who need them. The T&D System Operational Practices program acts on those outputs including Operating State declarations, protection configuration changes, and PSPS decisions are all informed by ODS products but authorized and executed through T&D Ops. Customer Service & Communications depends on ODS's 72-hour forecast window to meet advance notification requirements for PSPS events.

Phase 1 of ODS is focused exclusively on wildfire and extreme fire weather. The program is designed as the foundational use case for a broader, multi-hazard decision-support capability that REU plans to develop in the future.

## 7.2 Situational Awareness Technology

## REU 2026 Wildfire Mitigation Plan

REU maintains a set of standing technology capabilities that support situational awareness before, during, and after elevated fire weather events. These are the infrastructure layer that makes operational programs more effective. Cameras extend visibility into areas that crews cannot continuously patrol. AVL keeps the DOC informed of crew positions during fast-moving events. The common radio platform ensures that REU field staff and fire agency partners can communicate directly. The DOC integrates all of these inputs into a single operational picture for the Incident Commander and leadership.

These capabilities were established as part of REU's Wildfire Mitigation Program investment over multiple years. REU continuously evaluates the effectiveness of each capability and adjusts based on operational experience. One example of this evaluation process: REU implemented an AI fire watch software system in an earlier program cycle to provide automated smoke detection integrated with the camera network. After working closely with the Redding Fire Department and other stakeholders, REU determined that the system was generating more false alarms than actionable detections, and that the AlertCalifornia regional camera network, which has expanded significantly in coverage and quality in recent years, was providing more reliable fire detection capability without the false-alarm burden. REU discontinued the AI fire watch software in 2025 and now relies on the regional networks.

**Table 7-3. Situational Awareness Technology - Capabilities and Operational Use**

| Technology                                 | What It Provides                                                                                              | How It Is Used                                                                                                                                                                                                                                              |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| AlertWest / AlertCalifornia camera network | Regionally managed high-resolution fire detection cameras covering the broader Redding and Shasta County area | Supplemental fire detection and situational awareness beyond REU's own camera footprint. REU operators and RFD use this network as part of routine fire weather monitoring.                                                                                 |
| Unmanned Aerial Vehicles (UAVs)            | Aerial imagery, thermal detection via FLIR, and real-time video streaming to the DOC or command staff         | Available through the Redding Police Department, which maintains UAV capability developed under REU's Wildfire Mitigation Program. Deployed on request for emergency reconnaissance, hot spot identification, damage assessment, and post-event evaluation. |

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|                                    |                                                                                          |                                                                                                                                                                                                                                                             |
|------------------------------------|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Automatic Vehicle Location (AVL)   | Real-time GPS tracking of all REU electric utility vehicles                              | Crew positioning visibility during patrol and switching operations; safety monitoring during elevated events; dispatcher ability to direct nearest crew or alert personnel in at-risk areas.                                                                |
| Motorola radio platform            | Common radio communication platform for REU field crews, DOC, RFD, and RPD command staff | Interoperable field communications during elevated fire weather events, PSPS operations, and active fire response. Shared platform ensures REU crews and fire agency personnel can communicate directly without translation across systems.                 |
| Department Operations Center (DOC) | Centralized command and coordination facility at REU HQ, Avtech Parkway                  | Integration hub for SCADA, OMS, GIS, ODS products, camera feeds, and radio communications. Staffed during OS2/OS3 events and PSPS operations. Supports IC decision-making, crew coordination, and partner agency communications throughout elevated events. |

### 7.2.1 Department Operations Center

The Department Operations Center at REU's Avtech Parkway headquarters is the physical integration point for all of REU's situational awareness technology during elevated events. The DOC brings together SCADA system monitoring, outage management system data, GIS mapping, ODS decision-support products, live camera feeds, and radio communications in a single facility staffed by system operators, supervisors, and the Incident Commander during OS2 and OS3 conditions.

During a PSPS event, the DOC serves as the coordination hub for switching order execution, crew deployment, customer service communications, and partner agency coordination. It also provides the real-time operational picture that feeds the ODS dashboard and supports IC decision-making throughout the event. At Alert Level 3, the DOC is fully staffed and integrated with the City EOC.

### 7.2.2 Agency Data Sharing

REU's situational awareness is most effective when it is shared with the agencies that act on the same information. REU maintains standing data-sharing relationships with three City partners:

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**7.2.3 Redding Fire Department.** REU works closely with the Redding Fire Department during elevated fire weather and active wildfire incidents through direct communication, shared situational awareness, and coordinated use of regional monitoring tools. REU and RFD both use regional camera networks and interoperable radio communications to support fire weather monitoring, incident awareness, and operational coordination.

**7.2.4 Redding Police Department.** RPD receives outage and PSPS status updates to support public safety coordination during events. RPD also maintains the UAV and UAV van capability developed under REU's Wildfire Mitigation Program, available for deployment in support of emergency reconnaissance and damage assessment when requested.

**7.2.5 City Information Technology.** City IT provides integration support for REU's technology infrastructure, including network connectivity, system interoperability, and coordination on shared platforms.

Data sharing occurs through direct network access, scheduled distribution of ODS products, and verbal coordination during active events. REU's goal is that every partner agency with a role in wildfire response is operating from the same situational picture at the same time.

## 8 Customer and Community Resiliency

When a wildfire threatens REU’s service territory, when a PSPS is necessary, or when an outage disrupts service, REU’s obligation extends beyond the system. Customers depend on REU for timely information, direct outreach if they have medical needs, and rapid restoration when it is safe to do so. Section 8 describes the programs and protocols REU has in place to support customers and the community through those events.

### 8.1 Wildfire Improved Response Program

During 2025, REU provided funding support to the Redding Fire Department through the Council-approved Wildfire Improved Response Program and plans to continue that support in 2026. The partnership strengthens local emergency-response capacity and supports rapid, effective initial attack when fires threaten REU facilities, electric infrastructure, customers, or the broader community.

The program also supports coordination with CAL FIRE and Shasta County during wildfire incidents, access to REU facilities, and response to incidents involving or threatening the electric system. By enhancing local response capabilities, the partnership helps reduce the likelihood that a small ignition will develop into a more consequential wildfire. Program scope and funding are reviewed through the City’s annual budget and Council-approval processes.

### 8.2 Alert Level and Emergency Response Framework

All wildfire emergency operations at REU are conducted within the ICS structure established by SOP-200, REU’s all-hazards Emergency Operations Program. The Alert Level structure governs how REU activates its emergency response posture for wildfire-specific events, and directly drives when customer communications, critical customer outreach, and DOC staffing are activated.

**Table 8-1. Alert Level Framework: Wildfire Events**

| Level | Name                    | Wildfire Trigger                                                 | Activation Posture                                                                                                                                   |
|-------|-------------------------|------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
| 0     | Normal Operations       | No wildfire threat conditions                                    | Standard operations; ODS daily reporting cadence                                                                                                     |
| 1     | Possible Emergency      | Elevated wildfire risk identified; potential PSPS within 6+ days | Heightened monitoring; PSPS prep begins; RFD coordination initiated; key personnel notified; customer advance notifications initiated if PSPS likely |
| 2     | Very High Likelihood of | PSPS appears likely 72 hours ahead of event.                     | Preparations for a PSPS event are initiated; affected customers are notified of the likely PSPS event.                                               |

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|   |                     |                                                                                     |                                                                                                                                                |
|---|---------------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
|   | an<br>Emergency     |                                                                                     |                                                                                                                                                |
| 3 | Active<br>Emergency | Active wildfire threat<br>or PSPS event in<br>progress; ICS<br>activation warranted | Full ICS activated; DOC fully staffed;<br>City EOC integration; Unified<br>Command with Cal Fire and/or Shasta<br>County; mutual aid activated |

Alert Level escalation is driven by Operating State declarations from the T&D Operational Practices program. Customer Service communications and critical customer outreach are activated at Alert Level 1 and scale with each subsequent level. An OS3 declaration activates full ICS and City EOC integration. The Incident Commander holds final authority over PSPS activation, de-energization decisions, and escalation at Alert Level 2 and above.

ICS activation at Alert Level 3 establishes the Incident Commander with section chiefs for Operations, Engineering Planning and Technology, Logistics, and Finance and representatives from other City departments.

### 8.3 Post-Fire Restoration and Recovery

Post-fire restoration is the most operationally complex and financially consequential phase of a wildfire emergency. REU follows a six-step restoration process: Declaration and Assessment; Planning and Prioritization; Mobilization; Rebuild Execution; Financial Documentation and Recovery; and After-Action Review and Closeout.

Restoration prioritization uses a P1 through P4 framework that sequences work to address the most critical needs first:

**Table 8-2. Restoration Priority Framework**

| Priority | Category                | Description                                                                                                                                                                                         |
|----------|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| P1       | Life Safety             | Downed conductors, active fire hazards, and life-support customers.                                                                                                                                 |
| P2       | Critical Infrastructure | Hospitals, water treatment facilities, emergency services, communication nodes, sheriffs, fire, police, key utility facilities, incident command sites, evacuation centers, and broadcast stations. |
| P3       | System Stability        | Redding Power Plant, transmission backbone, substations, and circuit segments affecting the largest customer groups.                                                                                |
| P4       | General Restoration     | Remaining customer segments sequenced by capacity, terrain access, and system configuration to minimize total affected customers and outage duration.                                               |

REU maintains a critical material vendor list and labor contracts that can be activated immediately for major restoration events. For catastrophic events, REU is a member of

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the California Utility Emergency Association (CUEA) which supports mutual aid labor coordination. FEMA/CalOES financial documentation standards are applied from event onset for all Level 3 activations.

### 8.4 Customer Notification and Critical Customer Support

REU's customer notification program for PSPS events and wildfire-related outages operates on a tiered timeline coordinated with Operating State escalation and ODS forecast windows.

**Table 8-3. PSPS Customer Notification Timeline**

| Notification Type                             | Target Timing                                    | Channels and Scope                                                                                                                                                                          |
|-----------------------------------------------|--------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Advance notice                                | 72 hours before anticipated de-energization      | Text, email, outbound call, website update, social media, press release. All customers in affected Tier 2/3 areas and PSPS-eligible circuit segments.                                       |
| Imminent notice                               | 24 hours before de-energization                  | All channels updated. Direct contact with commercial customers in scope.                                                                                                                    |
| Medical Baseline / critical customer outreach | Before any de-energization                       | Direct personal phone call to all Medical Baseline and critical care registered customers. Contact attempts documented. Escalation to emergency services if a safety concern is identified. |
| Event updates                                 | Every 6 hours during an active event             | Website, social media, and direct communications to affected customers. Call center surge staffing is active.                                                                               |
| Restoration notification                      | Upon restoration or estimated restoration update | All channels. Website and outage map updated in real time as circuits are restored.                                                                                                         |

City Communications manages public messaging, social media, and media releases during wildfire events to ensure consistent messaging across City departments. REU's outage website and map are updated in real time throughout events as the authoritative public source for outage and restoration status.

#### 8.4.1 Medical Baseline and Critical Care Registry

REU maintains a registry of Medical Baseline and critical care customers who depend on electric power for life-sustaining equipment. The registry is reviewed and validated annually to maintain accuracy. Before any planned de-energization, REU makes direct personal phone contact with every registered customer. If a safety or health concern is

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identified during outreach, it is immediately escalated to Customer Service leadership and coordinated with emergency services as appropriate.

During extended outages, REU coordinates with City social services and community-based organizations to support customers who may need additional assistance.

Customer safety issues identified through call center interactions or field reports are immediately escalated through the Customer Service chain and coordinated with Operations and Emergency Operations.

### **8.5 Community Outreach and Preparedness**

REU conducts seasonal wildfire preparedness outreach before and during fire season to help customers prepare for potential outages, and take protective actions. Outreach is coordinated with City Communications and the Redding Fire Department to ensure consistent messaging across City channels.

Seasonal preparedness activities include wildfire preparedness messaging through REU's customer communications channels, social media campaigns timed to fire season onset, coordination with RFD on community fire preparedness events, and updates to REU's website with PSPS preparedness information and the outage map. REU also updates communication templates and notification lists annually as part of pre-season readiness preparation.

## 9 Safety, Compliance, and Governance

Section 3 fully describes REU’s portfolio governance structure, including the ownership hierarchy, program charter architecture, and the roles of the Portfolio Owner, Program Owners, and Risk Oversight Committee. This section describes the compliance and safety functions that work within that structure to keep the portfolio on track, along with the regulatory obligations that define REU’s external accountability framework.

### 9.1 Regulatory Compliance Obligations

REU’s Wildfire Mitigation Plan operates under a defined set of regulatory obligations established by California Public Utilities Code 8387 and enforced through the Wildfire Safety Advisory Board (WSAB). These obligations set the minimum cadence for plan updates, external submissions, and independent evaluation.

**Table 9-1. WMP Regulatory Obligations**

| Obligation                       | Cadence       | Timing                                          | Description                                                                                                                                           |
|----------------------------------|---------------|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| Annual City Council Presentation | Every year    | July (target)                                   | Program performance results drawn from Part II annual reports, planned improvements, and public comment opportunity.                                  |
| Internal Annual Review           | Every year    | Q1 of the following program year                | Program Owners complete Part II reports; portfolio-level review completed; corrective actions logged and tracked.                                     |
| Biennial External Submission     | Every 2 years | Following City Council adoption (2026, 2028...) | Full WMP submission to WSAB following City Council adoption. The 2026 biennial submission follows City Council adoption targeted for August 18, 2026. |
| Independent Evaluation           | Every 4 years | 2026, 2030, 2034...                             | A qualified independent evaluator assesses WMP comprehensiveness and program execution. Findings and REU response made publicly available.            |

The biennial external submission and the independent evaluation are the primary external accountability mechanisms. The annual City Council presentation and internal review cycle are the primary internal accountability mechanisms. All four operate in coordination. The internal review produces the Part II annual reports that support both the City Council presentation and the external submission.

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### 9.1.1 Applicable General Orders

REU's wildfire mitigation programs operate under the following CPUC General Orders, which establish minimum standards for inspection, maintenance, construction, and operations:

- **GO 95** - Overhead Electric Line Construction. Governs construction standards, clearances, and maintenance of overhead lines and equipment. Rule 18 establishes corrective action timelines for conditions that may endanger life or property, including fire-hazard-specific timelines in CPUC Tier 2 and Tier 3 areas. This is the primary regulatory basis for REU's P-level defect prioritization system.
- **GO 128** - Underground Electric Supply and Communication Systems. Governs construction, maintenance, and inspection standards for underground facilities.
- **GO 165** - Inspection Requirements for Electric Transmission and Distribution Lines. Defines patrol, detailed, and intrusive inspection types, maximum inspection intervals, and record retention requirements. REU's inspection program is designed to meet or exceed all GO 165 requirements.

Where REU's internal standards are more stringent than the applicable General Order, the stricter standard governs.

## 9.2 Role of REU's Compliance Program

The Compliance Program ensures that the governance machinery keeps running: that obligations are tracked, that documents are current and controlled, that corrective actions don't fall through the cracks, and that the portfolio is audit-ready at all times.

**Table 9-2. What the Compliance Program Tracks and Enforces**

| Compliance Tracks             | Description                                                                                                                                                                                                                    |
|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Reporting cadence obligations | Annual City Council presentation, biennial WSAB submission, and independent evaluation deadlines are tracked with advance reminders and escalation if milestone dates are at risk.                                             |
| Regulatory changes            | Changes to applicable CPUC General Orders, WSAB advisory standards, and statutory requirements are monitored and flagged to the Portfolio Governance Lead for assessment and incorporation into program charters as warranted. |
| Document control              | Program charters, annual reports, and supporting technical documents are maintained as system-of-record artifacts with version control, approval records, and retention per REU's document retention policy.                   |

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|                            |                                                                                                                                                                                                                                                                                 |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Corrective action tracking | Material issues, including compliance findings, audit results, and execution gaps, are logged, assigned to Program Owners, and tracked to closure. Escalation follows the path: Program Owner to Program Steering Committee to Executive Steering Committee to Portfolio Owner. |
| Auditability               | The portfolio is maintained in a state of continuous auditability. Any program's charter, annual report, and corrective action history can be produced for regulatory review, independent evaluation, or public records request at any point in the program cycle.              |

The Compliance Program is led by REU's Compliance Officer, who also serves as Portfolio Governance Lead. This dual role ensures that the person responsible for regulatory compliance has direct visibility into program execution status and can identify and escalate gaps before they become findings.

### 9.3 Safety Program Integration

REU's Safety Program integrates wildfire mitigation activities into REU's existing safety management systems. Wildfire mitigation field work such as vegetation management, inspections, patrol operations, switching, and PSPS execution all carry safety risks to crews that must be managed alongside the fire risk reduction objectives. The Safety Program ensures that safety expectations are reinforced during elevated risk periods, that incidents and near-misses during wildfire mitigation activities are captured and reviewed, and that safety findings feed back into governance and continuous improvement.

Portfolio priorities, program scope, and execution methods remain the responsibility of the designated portfolio and program owners. Management retains responsibility for directing work and supervising employees. Safety provides oversight, monitoring, and feedback.

## 10. 2025 Annual Performance Report

### 10.1 Portfolio Summary

The 2025 fire season was favorable relative to historical norms. REU's Operational Decision Support program recorded only 5 hours that exceeded conditions for Operating State 2 and 94 hours that exceeded conditions for Operating State 1 during the season, placing 2025 at the 8.6th and 33.3rd historical percentiles, respectively. No OS2 or OS3 declarations were required, and in its first year under the formal PSPS governance framework, REU recorded zero PSPS activations. These milder conditions allowed REU to validate new programs and frameworks under lower-stress conditions, while recognizing that some elements are best assessed during more elevated fire weather.

Table 10-0 places the 2025 fire weather season in historical context. While sustained wind hours at or above 20 mph were elevated (71st percentile) and gusts at or above 30 mph were near typical (57th percentile), fuel conditions remained favorable enough that the combination of wind and dry fuels rarely reached the FPI/wind thresholds that trigger Operating State escalation. In 2025, significant wind events occurred while fuel moisture and fire potential remained low enough to keep the system in normal or near-normal posture for nearly the entire season.

**Table 10-0. 2025 Fire Weather Severity Context**

| Metric             | 2025 Value | Historical Percentile | % of Years Worse | Interpretation |
|--------------------|------------|-----------------------|------------------|----------------|
| OS2 Conditions     | 5          | 29 <sup>th</sup>      | 71%              | Favorable      |
| OS1 Conditions     | 94         | 33 <sup>rd</sup>      | 67%              | Favorable      |
| Wind ≥20 mph Hours | 207        | 71 <sup>st</sup>      | 29%              | Elevated wind  |
| Wind ≥30 mph Hours | 12         | 70 <sup>th</sup>      | 30%              | Elevated wind  |
| Gust ≥20 mph Hours | 1,043      | 43 <sup>rd</sup>      | 57%              | Near typical   |
| Gust ≥30 mph Hours | 268        | 57 <sup>th</sup>      | 43%              | Near typical   |
| Gust ≥40 mph Hours | 61         | 52 <sup>nd</sup>      | 48%              | Near typical   |

*Source: REU ODS program analysis of Redding RAWS weather station data, 2005–2025.*

The standout outcome for 2025 is the reduction in REU-attributed wildfire ignitions to one, the lowest on record and an 89% reduction from the 2021 baseline of nine. Equipment-related wires-down events also decreased, from eight to four. These results reflect the compounding effect of vegetation management, inspection, and operational practice improvements across multiple program years.

One outcome indicator warrants attention heading into 2026: vegetation-caused outages increased from seven in 2024 to nineteen in 2025. This is under active review across the

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vegetation management and inspection programs and is driving specific corrective actions and planned improvements.

**Table 10-1. Portfolio-Level Outcome Indicators (2021–2025)**

| Outcome Indicator                   | 2021        | 2022        | 2023        | 2024        | 2025 | 2026 Target |
|-------------------------------------|-------------|-------------|-------------|-------------|------|-------------|
| REU-attributed wildfire ignitions   | 9           | 4           | 4           | 4           | 1    | 0           |
| Equipment-related wires-down events | 5           | 7           | 8           | 8           | 4    | 0           |
| PSPS events activated               | Not tracked | Not tracked | Not tracked | Not tracked | 0    | N/A         |
| P1 defects closed within 72 hours   | Not tracked | Not tracked | Not tracked | Not tracked | 100% | 100%        |
| Vegetation-caused outages (total)   | Not tracked | Not tracked | Not tracked | 7           | 19   | 0           |
| P1 conditions at time of inspection | Not tracked | Not tracked | Not tracked | 286         | 163  | 0           |

NOTE: Dashes indicate metric was not yet tracked in that program year.

Table 10-2 summarizes each program's status and key results for 2025.

**Table 10-2. 2025 Program Performance Summary**

| Program                      | Status   | Key Results                                                                                                                                                                                                                                                                                  |
|------------------------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Wildfire Risk Framework      | On Track | <ul style="list-style-type: none"> <li>Year 1 framework development complete</li> <li>Six lessons learned; five planned improvements for 2026</li> <li>No major activating event; elements best assessed under elevated fire weather will be evaluated in future seasons.</li> </ul>         |
| Operational Decision Support | On Track | <ul style="list-style-type: none"> <li>Mild season; no elevated fire weather events</li> <li>All effectiveness indicators rated Effective or Partial</li> <li>Nightly Outlook delivered on time throughout season</li> <li>4 planned improvements including all-hazards expansion</li> </ul> |
| Vegetation Management        | On Track | <ul style="list-style-type: none"> <li>All activity targets met</li> <li>8,602 trees trimmed; 512 acres of fuels treated</li> <li>P1 conditions reduced 43% (286 → 163)</li> </ul>                                                                                                           |

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|                                   |          |                                                                                                                                                                                                                                                                                                   |
|-----------------------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                   |          | <ul style="list-style-type: none"> <li>Vegetation-caused outages increased 7 → 19</li> </ul>                                                                                                                                                                                                      |
| Asset Inspection Program          | On Track | <ul style="list-style-type: none"> <li>1,588 defects documented across all P-levels</li> <li>100% P1 corrective action on-time closure rate (42 of 42)</li> <li>Ignitions decreased from 4 (2024) to 1 (2025)</li> <li>Wires-down decreased from 8 to 4</li> </ul>                                |
| T&D Operational Practices         | On Track | <ul style="list-style-type: none"> <li>First full season under OS0–OS3 framework</li> <li>Standing switch log validated pre-season</li> <li>No OS2/OS3 events; no PSPS activations</li> <li>Annual wildfire EOPS training completed September 2025</li> </ul>                                     |
| System Hardening                  | Partial  | <ul style="list-style-type: none"> <li>94 of 127 target locations completed</li> <li>33 locations carried into 2026</li> <li>No ignitions at previously hardened locations</li> </ul>                                                                                                             |
| Fire Mitigation System Upgrades   | Planning | <ul style="list-style-type: none"> <li>2025 was the evaluation and framework development phase</li> <li>Engineering decision framework conceptualized</li> <li>No large-scale capital deployments executed</li> <li>2026: continue refinement once updated Risk Framework is in place.</li> </ul> |
| Fire-Retardant Pole Wrap          | On Track | <ul style="list-style-type: none"> <li>370 new installations, exceeding the 250-pole target by 120</li> <li>All 1,374 poles inspected; 123 reclassified as exempt, 1,151 of 1,251 total eligible poles wrapped cumulative</li> </ul>                                                              |
| Customer Service & Communications | On Track | <ul style="list-style-type: none"> <li>No PSPS events; no wildfire-related emergency activations</li> <li>Medical Baseline and critical care registry validated</li> <li>Notification procedures and templates confirmed ready</li> </ul>                                                         |
| Emergency Response & Recovery     | On Track | <ul style="list-style-type: none"> <li>No wildfire emergency activations in 2025</li> <li>Pre-season readiness and ICS posture maintained</li> <li>Annual ICS drill completed September 2025</li> </ul>                                                                                           |

### 10.2 Wildfire Risk Framework

#### 10.2.1 2025 Execution Summary

2025 was the first full year of operation under REU's updated Wildfire Risk Framework. The program completed initial development and operationalization of the four-driver framework, established tier designations for in-scope overhead assets and circuits, and implemented nightly reporting and a prototype dashboard through the ODS program. The framework supported Operating State determinations and situational awareness discussions throughout the fire season.

#### 10.2.2 Performance Results

All five leading indicators were met:

- Core tier designations established for all in-scope overhead assets and circuits
- Risk driver rationale documented for all identified higher-risk areas
- Major WMP programs are explicitly mapped to one or more risk drivers through the risk-driver-to-program traceability framework.
- Key data and process gaps identified and documented with remediation plans
- Annual review and validation of tier designations completed through internal SME review

No major wildfire events occurred, limiting formal post-event validation. Tabletop exercises and internal reviews served as the primary validation mechanism.

#### 10.2.3 Lessons Learned and Planned Improvements

- Trigger logic relied primarily on a single point weather forecast located at the Redding airport, which may not represent conditions across the full service territory. Expanding to a more granular weather forecast product should be a priority.
- A formal after-event report template, trigger criteria, and retention process should be finalized and implemented for any Red Flag Warning period and any wildfire-related Alert Level 1, 2, or 3 event to ensure consistent documentation
- The wildfire risk framework should supplement adopted fire-threat map designations with more dynamic, consequence-driven spatial analysis focused on identifying where utility-caused ignitions could result in the greatest public safety, community, and system impacts. By using both adopted fire-threat maps and consequence-based analysis, REU can better prioritize actions that reduce the risk and consequences of utility-caused ignitions while also protecting utility assets and maintaining system resilience against wildfires originating from any source.
- REU's 2025 review confirmed that improved outage, ignition, and root-cause data will strengthen future wildfire risk analysis. While existing data provides useful directional insight, REU identified opportunities to improve consistency, completeness, and repeatability in how outage causes and wildfire-related event data are captured and reviewed. Improving this data will support more reliable trend analysis, better risk-driver validation, and more informed prioritization of future mitigation work.

### 10.3 Operational Decision Support

#### 10.3.1 2025 Execution Summary

The ODS program provided nightly Wildfire Operational Outlook reports throughout fire season and maintained the real-time operational dashboard. No elevated fire weather events occurred in 2025, so the program operated primarily in steady-state readiness mode.

#### 10.3.2 Performance Results

All effectiveness indicators were rated Effective or Partial:

- Nightly Wildfire Operational Outlook distributed on time throughout the season
- Advance identification of elevated wildfire risk conditions: Effective
- Clarity and usefulness of Operating State anticipation: Effective, with positive feedback from Operations, leadership, and EOC
- Forecast-to-observed alignment: Partial because the mild season limited meaningful validation

#### 10.3.3 Lessons Learned and Planned Improvements

- Plan to develop the ODS system on REU's intranet for citywide access.
- Expand to an all-hazards decision support scope to build year-round emergency preparedness culture beyond fire season.
- Add spatial awareness capability to support geographically differentiated risk assessment within the service territory.
- Update execution logic to incorporate anticipated Wildfire Risk Framework changes once finalized.

### 10.4 Vegetation Management Program

#### 10.4.1 2025 Execution Summary

The Vegetation Management Program executed all planned inspection, line clearance, pole base clearance, and targeted fuels reduction activities. The program also continued a strategic transition from fixed trim cycles toward condition- and trend-based planning, incorporating GIS-based dashboards into daily operations for the first time.

#### 10.4.2 Performance Results

All activity targets were met:

- Vegetation around Transmission assets: 100% inspected by October 15, 2025 (prior to December 31 target)
- Distribution assets: 100% inspected by December 20, 2025 (prior to December 31 target)
- Line clearance: all 8,602 identified trees trimmed
- Pole base clearance: 100% completed by May 26 (ahead of June 1 target)

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- Targeted fuels reduction: 512 acres treated (exceeded 500-acre target)
- P1 conditions at time of inspection decreased from 286 to 163 (43% reduction)

Vegetation-caused outages increased from 7 in 2024 to 19 in 2025. The increase may reflect limitations of the fixed-cycle trim model in high-growth corridors; inspection and clearance execution remained on schedule. Root cause investigation is underway.

### 10.4.3 Lessons Learned and Planned Improvements

- Narrow ROW treatments produced rapid regrowth in high-growth corridors. Consider standardizing expanded treatment widths of 50-80 feet, including ladder fuel removal, for Tier 2 and Tier 3 areas moving forward.
- The transition from cycle-based to condition-based planning is prompting updates to REU's vegetation management standards, including formal off-cycle trigger thresholds, such as recurring P2 conditions trending toward P1, so the approach is consistent and defensible.
- IS dashboard deployment revealed data quality gaps. Data validation rules, required fields, and supervisor-level review have been added as an in-progress corrective action.
- 

## 10.5 Asset Inspection Program

### 10.5.1 2025 Execution Summary

The Inspection Program completed patrol, detailed, and intrusive inspection cycles across REU's distribution system, documented 1,588 defects across all P-levels, and executed corrective actions within required GO95 Rule 18 timelines.

### 10.5.2 Performance Results

- Patrol inspections: 15,236 of 15,378 target locations completed
- Detailed inspections: 1,110 completed (exceeded target of 1,080)
- Intrusive inspections: 1,045 of 1,128 targets completed
- All 1,588 defects entered and supervisor-reviewed
- P1 corrective actions: 42 of 42 closed within 72 hours (100%)
- P2 corrective actions: 3 of 3 closed within 6 months (100%)

### 10.5.3 Lessons Learned and Planned Improvements

- Minor variability in preliminary P-level assignments between inspectors was observed. Formalized early defect alignment reviews to reinforce consistent Rule 18 interpretation are planned.
- Photo documentation standards for certain defect categories require strengthening.
- Direct system linkage between GIS defect records and the SSP LifeCycle work order system remains manual. Improving this linkage is a high-priority improvement for 2026.

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- Ground-based infrared evaluation to identify thermal anomalies is under evaluation as a near-term enhancement.

### **10.6 T&D System Operational Practices**

#### **10.6.1 2025 Execution Summary**

2025 was the first full fire season operating under the defined OS0–OS3 framework. The program validated daily monitoring workflows, OS declaration documentation, control room logging, and the standing switch log under lower-stress conditions.

#### **10.6.2 Performance Results**

- Pre-season switching order verification completed; log found accurate with minor updates required
- Operating States 0–3 applied throughout the season without a declared OS2 or OS3 event
- No PSPS events activated
- Standing switch log approach validated as operationally sound for 2026
- Annual OS2/OS3 drill completed as a training exercise in September 2025.

#### **10.6.3 Lessons Learned and Planned Improvements**

- The annual OS2/OS3 drill was completed as a PSPS training in September 2025. The training revealed no major gaps. A similar drill using the updated risk framework and decision support tools should be completed prior to the 2026 fire season.
- The standing switch log requires revision once the updated Wildfire Risk Framework is finalized in 2026. Circuits are expected to be reclassified, changing which segments require elevated protection configurations. This is an open corrective action pending framework completion.
- Capital improvements to reduce switching complexity, including sectionalizing, automation, or equipment upgrades, should be evaluated as a medium-priority planned improvement over the next few years.

### **10.7 System Hardening Program**

#### **10.7.1 2025 Execution Summary**

The System Hardening Program executed pole-top retrofits, non-expulsion fuses, wildlife protection covers, and surge arresters at targeted Tier 2 and Tier 3 locations.

#### **10.7.2 Performance Results**

- 94 of 127 target locations completed at a cost of approximately \$285,000
- 33 locations carried into 2026 due to permitting complexity, substation switching complexity, and seasonal wetland access constraints

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- No equipment-related ignitions recorded at previously hardened locations.
- All locations are cleared of vegetation around the base of the pole.
- 13 equipment-related outages occurred at hardened locations; most were fuse operations; none were classified as hardening failures

### **10.7.3 Lessons Learned and Planned Improvements**

- CalTrans-permitted locations require encroachment permits initiated earlier in the annual planning cycle. Substation getaway locations should be scheduled during planned substation outages.
- Seasonal wetland access must be scheduled during dry months. Advance scheduling is now built into the 2026 work plan.
- Outage and ignition tracking at hardened assets was limited by internal record-keeping constraints. Improving this tracking is a high-priority improvement for 2026.

## **10.8 Fire Mitigation System Upgrades Program**

### **10.8.1 2025 Execution Summary**

2025 was an evaluation and framework development phase. The program focused on building engineering decision criteria, evaluating mitigation strategies in the context of the updated Wildfire Risk Framework, and preparing for capital deployment in future cycles.

### **10.8.2 Performance Results**

- Engineering decision framework conceptualized.
- Mitigation strategies evaluated: relay and protection upgrades, covered conductor, targeted undergrounding, field recloser installation, SCADA-controlled switching
- No large-scale capital deployments executed in 2025

### **10.8.3 2026 Direction**

The 2026 cycle will refine prioritization criteria and begin identifying specific target locations as updated Risk Framework circuit risk classifications are finalized. The program will begin to transition from planning in 2025 to initial engineering and project scoping 2026 and 2027.

## **10.9 Fire-Retardant Pole Wrap Program**

### **10.9.1 2025 Execution Summary**

The program executed new wrap installations, completed a comprehensive inspection of all identified poles, and refined the eligible population through application of exemption criteria.

### **10.9.2 Performance Results**

- 370 new wraps installed, exceeding the 250-pole target by 120
- 1,151 of 1,251 eligible poles wrapped cumulative through 2025

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- All 1,374 identified poles inspected
- 123 poles reclassified as exempt, reducing target population to 1,251

### **10.9.3 Lessons Learned and Planned Improvements**

- Distribution and transmission poles must be separated during material planning due to structural size differences affecting material quantities. This has been incorporated into the 2026 planning process.
- A biennial inspection and maintenance cycle is being formalized to ensure long-term wrap integrity across the growing installed population.

## **10.10 Customer Service, Communications, and Emergency Response**

### **10.10.1 2025 Execution Summary**

The Customer Service & Communications program maintained seasonal preparedness outreach, validated notification systems and templates, and confirmed Medical Baseline registry readiness. The Emergency Response program maintained ICS readiness posture throughout fire season.

### **10.10.2 Performance Results**

- No PSPS events activated; no wildfire-related emergency activations in 2025
- Medical Baseline and critical care registry validated
- Notification systems, templates, and call center readiness confirmed

### **10.10.3 2026 Priorities**

- Customer impact tracking processes should be strengthened to ensure consistent documentation of all wildfire-related operational actions, including Red Flag Warning periods and OS1 events.
- Communication templates and notification lists require annual pre-season review and update.

## 11 Coming Year Work Plan and Goals

This section documents REU’s planned work and objectives for the 2026–2028 program horizon. Goals are organized by portfolio layer and program, consistent with the structure of Section 10, and are specific and measurable so that progress can be verified in the next annual performance report.

The 2026–2028 work plan progresses from framework completion and program readiness, through systemwide integration, to initial capital deployment. Tables 11-1 and 11-2 establish measurable outcomes for 2026 and 2027, while Section 11.3 identifies the 2028 planning horizon.

### 11.1 2026 Goals

The primary focus of 2026 is completing the Wildfire Risk Framework update before fire season and ensuring all programs that depend on it are ready to operate under the new framework on Day 1 of fire season. The secondary focus is maintaining strong execution across all operational programs and completing the first biennial WSAB submission and independent evaluation.

**Table 11-1. 2026 Program Goals**

| Program                                  | Measurable Outcome                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Completion Target                                                                                           |
|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| <b>Governance &amp; Compliance</b>       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                             |
| Wildfire Mitigation Portfolio Governance | <ul style="list-style-type: none"> <li>Governance performance indicators refined and measurable metrics established for reporting timeliness, corrective action closure, and cross-program coordination</li> <li>Annual governance calendar formally tracked with milestone completion documented across all 11 programs</li> <li>2026 Independent Evaluation completed in advance of October WSAB biennial submission</li> <li>All Part II annual reports completed in Q1 2026 and presented to City Council on August 18, 2026</li> </ul> | <ul style="list-style-type: none"> <li>August 18, 2026 (City Council); following adoption (WSAB)</li> </ul> |
| <b>Risk Intelligence</b>                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                             |

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|                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                  |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Wildfire Risk Framework           | <ul style="list-style-type: none"> <li>Updated four-driver framework finalized with revised circuit tier designations, updated FPI'/wind thresholds, and expanded weather data inputs, with governance approval completed before fire season</li> <li>Formal after-event report (AER) template and requirement established; at least one AER completed during 2026 fire season</li> <li>Wind-speed-versus-outage-frequency visualization developed and incorporated into framework documentation</li> </ul>                      | August 31, 2026, May 1 <sup>st</sup> thereafter  |
| Operational Decision Support      | <ul style="list-style-type: none"> <li>ODS execution logic, thresholds, and escalation products updated to reflect revised Wildfire Risk Framework, with deployment completed before fire season</li> <li>Real-time operational dashboard resilience improved</li> </ul>                                                                                                                                                                                                                                                         | August 31, 2026, May 1 <sup>st</sup> thereafter) |
| <b>Operational Risk Reduction</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                  |
| Vegetation Management             | <ul style="list-style-type: none"> <li>Root cause analysis for 2025 vegetation-caused outage increase (7 → 19) documented and corrective actions incorporated into 2026 work plan</li> <li>Expanded treatment widths of 50–80 feet codified as program standard in Tier 2 and Tier 3 areas</li> <li>Formal off-cycle trigger thresholds (e.g., recurring P2 trending toward P1) documented and applied to 2026 work prioritization</li> <li>GIS data validation rules fully implemented; data quality audit completed</li> </ul> | May 1 (root cause + standards); ongoing          |
| T&D Operational Practices         | <ul style="list-style-type: none"> <li>Standing switch log revised to reflect updated Wildfire Risk Framework circuit tier designations, with Operations Supervisor sign-off obtained before fire season</li> <li>Annual OS2/OS3 ICS drill completed before fire season opens</li> <li>Engineering evaluation of capital improvements to reduce switching complexity initiated</li> </ul>                                                                                                                                        | August 31, 2026, July 31 thereafter              |
| <b>Capital Risk Reduction</b>     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                  |

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|                                            |                                                                                                                                                                                                                                                                                                                                                                                                    |                                     |
|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| System Hardening                           | <ul style="list-style-type: none"> <li>• All 33 locations carried over from 2025.</li> <li>• Outage and ignition tracking at hardened assets improved through updated record-keeping process</li> <li>• Annual target for new hardening locations set and work plan approved based on updated Risk Framework outputs</li> </ul>                                                                    | December 31, 2026                   |
| Fire Mitigation System Upgrades            | <ul style="list-style-type: none"> <li>• Engineering decision framework refined using updated Risk Framework circuit risk classifications</li> <li>• Priority target locations identified for relay/protection upgrades, covered conductor, or field recloser installation</li> <li>• Initial engineering and project scoping begun on highest-priority identified locations</li> </ul>            | Q4 2026                             |
| Fire-Retardant Pole Wrap                   | <ul style="list-style-type: none"> <li>• Remaining eligible poles wrapped, bringing cumulative total to 1,251 of 1,251 (100% of the revised target), with CalTrans and switching-constrained locations coordinated in advance</li> <li>• Biennial wrap inspection and maintenance cycle formalized in program charter and scheduled for first execution in 2027</li> </ul>                         | August 31, 2026, July 31 thereafter |
| <b>Customer &amp; Community Resiliency</b> |                                                                                                                                                                                                                                                                                                                                                                                                    |                                     |
| Customer Service & Communications          | <ul style="list-style-type: none"> <li>• Customer impact tracking process documented and deployed to establish consistent documentation of all wildfire-related operational actions including Red Flag Warning periods and OS1 events</li> <li>• Communication templates and notification lists updated pre-season</li> <li>• Medical Baseline registry reviewed and validated annually</li> </ul> | August 31, 2026, July 31 thereafter |
| Emergency Response & Recovery              | <ul style="list-style-type: none"> <li>• Annual ICS drill completed before fire season opens, with an after-action review documented</li> <li>• PSPS Temporal Roles and Responsibilities Matrix reviewed and updated to reflect any changes from the Risk Framework update</li> </ul>                                                                                                              | August 31, 2026, July 31 thereafter |

## 11.2 2027 Goals

The primary focus of 2027 is on integrating the updated Risk Framework outputs into every program that uses risk-based targeting, advancing ODS to all-hazards capability, and transitioning Fire Mitigation System Upgrades from planning to capital execution.

**Table 11-2. 2027 Program Goals**

| Program                                  | Measurable Outcome                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Deadline                    |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| <b>Governance &amp; Compliance</b>       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                             |
| Wildfire Mitigation Portfolio Governance | <ul style="list-style-type: none"> <li>All program charters updated to reflect Risk Framework integration outcomes</li> <li>Governance performance indicator tracking fully operational across all 11 programs</li> <li>Biennial WSAB submission follow-up actions from 2026 IE findings completed and documented</li> </ul>                                                                                                                                                                                                                                                                                                                             | Q1 2027 (charters); ongoing |
| <b>Risk Intelligence</b>                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                             |
| Wildfire Risk Framework                  | <ul style="list-style-type: none"> <li>Supplement adopted fire-threat map designations with dynamic, consequence-driven spatial analysis focused on identifying where utility-caused ignitions could result in the greatest public safety, community, and system impacts, with the methodology documented and approved through governance</li> <li>Updated framework outputs validated through at least one elevated fire weather event or tabletop exercise with documented after-action review</li> <li>Weather station evaluation completed; recommendation on additional stations and integration into decision-making process documented</li> </ul> | Q4 2027                     |

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|                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Operational Decision Support      | <ul style="list-style-type: none"> <li>• ODS Phase 2 all-hazards scope defined and charter updated, with year-round decision support operational covering at minimum one additional hazard type beyond wildfire</li> <li>• Spatial awareness capability added to ODS products to support geographically differentiated risk assessment within the service territory</li> </ul>                                                                                                                                                                                                                                          | Q4 2027                        |
| <b>Operational Risk Reduction</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                |
| Vegetation Management             | <ul style="list-style-type: none"> <li>• Inspection prioritization, clearance targets, and fuels reduction treatment areas updated to reflect revised circuit tier designations and applied for the full 2027 program cycle</li> <li>• Span-level regrowth tracking implemented using clearance-achieved data to support condition-based scheduling</li> <li>• Vegetation-caused outage trend confirmed declining from 2025 peak</li> </ul>                                                                                                                                                                             | Q1 2027 (integration); ongoing |
| Asset Inspection Program          | <ul style="list-style-type: none"> <li>• Photo documentation standards strengthened; supervisor sampling review formalized</li> <li>• Early defect alignment review process implemented to reduce inter-inspector P-level variability</li> <li>• Ground-based infrared evaluation feasibility assessment completed</li> <li>• Inspection sequencing and P-level minimum priority floors updated to reflect revised circuit tier designations and applied for the full 2027 inspection cycle</li> <li>• Ground-based infrared inspection capability deployed on a pilot basis in highest-risk Tier 3 circuits</li> </ul> | Q2 2027                        |
| T&D Operational Practices         | <ul style="list-style-type: none"> <li>• Capital improvements to reduce switching complexity: engineering assessment complete with specific recommendations for sectionalizing, automation, or equipment upgrades</li> <li>• Annual OS2/OS3 drill completed before the 2027 fire season as the first drill under the fully updated Risk Framework</li> </ul>                                                                                                                                                                                                                                                            | May 1 (drill); Q3 (assessment) |

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| Capital Risk Reduction            |                                                                                                                                                                                                                                                                                                                                                              |                                              |
|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| System Hardening                  | <ul style="list-style-type: none"><li>Updated circuit tier designations used to reprioritize System Hardening candidate locations, with a revised annual target and approved work plan</li><li>Outage and ignition tracking at hardened assets fully operational for 2027 program year</li></ul>                                                             | Q1 2027                                      |
| Fire Mitigation System Upgrades   | <ul style="list-style-type: none"><li>Initial capital projects in engineering design or construction on highest-priority circuits identified in 2027</li><li>Field recloser and SCADA switching capital needs assessment completed with specific locations and cost estimates</li></ul>                                                                      | Q4 2027                                      |
| Fire-Retardant Pole Wrap          | <ul style="list-style-type: none"><li>Biennial wrap inspection and maintenance cycle executed across the full installed population condition data documented in GIS Field Maps</li><li>Updated Risk Framework circuit tier designations reviewed against current wrap population any additions or reclassifications incorporated into 2027 targets</li></ul> | Q2 2027 (inspection);<br>Q1 2027 (targeting) |
| Customer & Community Resiliency   |                                                                                                                                                                                                                                                                                                                                                              |                                              |
| Customer Service & Communications | <ul style="list-style-type: none"><li>Customer impact tracking process fully operational with consistent documentation confirmed through at least one elevated fire weather period or drill</li><li>Enhanced coordination with community-based organizations piloted for extended outage support</li></ul>                                                   | Ongoing; Q4 2027 (pilot eval)                |
| Emergency Response & Recovery     | <ul style="list-style-type: none"><li>Annual ICS drill completed before the 2027 fire season, incorporating lessons from the 2026 drill after-action review</li><li>Post-fire restoration priority framework reviewed and updated to reflect any changes from Risk Framework update</li></ul>                                                                | May 1 (pre-fire season)                      |

### 11.3 2028 Planning Horizon

2028 marks the transition to full capital deployment under the Fire Mitigation System Upgrades program. Specific targets and circuit selection will be established during the

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2027 planning cycle once Risk Framework integration is complete and engineering assessments are finalized. No major new deployment beyond System Hardening annual targets and pole wrap completion is anticipated before that point.

The 2028 planning horizon goals are:

- First Fire Mitigation System Upgrades capital projects in design on highest-priority circuits identified through the updated Risk Framework
- Covered conductor construction standards established and initial designs are in process.
- Field recloser and/or SCADA switching infrastructure capital projects in engineering or construction based on 2027 assessment recommendations
- ODS Phase 2 all-hazards capability fully operational and validated through at least one non-wildfire hazard event
- System Hardening annual target set based on three years of updated Risk Framework prioritization data

## 12 Multi-Year Roadmap and Program Maturity

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Section 11 documents REU's specific goals and measurable outcomes for 2026 through 2028. This section provides a broader view of the maturity trajectory, including where each program and the portfolio are headed and how three years of work combine to strengthen the wildfire mitigation posture.

### 12.1 Portfolio Trajectory

REU's wildfire mitigation portfolio is in the early stages of a deliberate maturation process:

- **Phase 1 - Establishment (2025).** Core governance, risk, decision-support, and program-charter structures were established and validated under a comparatively mild fire season.
- **Phase 2 - Integration (2026–2027).** A common, annually calibrated risk picture is integrated across program prioritization, operating readiness, and portfolio governance. Data and decision-support workflows function as a coordinated system rather than as separate program processes.
- **Phase 3 - Capital Deployment (2028 and beyond).** Permanent infrastructure investments increasingly reduce residual wildfire risk and recurring operational burden, allowing the portfolio to shift from establishment and integration toward sustained risk reduction and performance optimization.
- **Long-Term Portfolio Rebalancing.** Phase 3 is expected to extend across multiple planning cycles as priority capital projects move through design, construction, and operation. REU anticipates using calendar year 2032 as a long-term planning checkpoint to evaluate the extent to which these investments have reduced residual utility wildfire risk. Based on updated risk results and demonstrated program performance, REU will assess whether the scope and budgets of enhanced operational programs and customer and community resiliency programs can be right-sized, reduced, redirected, or repurposed. This review may include supplemental emergency-response support, wildfire-specific operating practices, PSPS-related customer support, and other measures intended primarily to manage the consequences or community impacts of utility wildfire risk. Core safety, inspection, vegetation management, emergency-response, customer-notification, and regulatory obligations will continue to be maintained.

The trajectory reflects a fundamental principle: operational programs manage current risk, while capital programs reduce future risk. REU will use the 2032 planning checkpoint described above to evaluate portfolio rebalancing while continuing to provide safe, reliable, and financially responsible electric service.

### 12.2 Program Maturity Trajectory

## REU 2026 Wildfire Mitigation Plan

The table below describes where each major program area is expected to be at the end of each planning year. These descriptions are directional. Section 11 documents the specific near-term targets.

**Table 12-1. Program Maturity Trajectory: 2026 Through 2028**

| Program / Area               | 2026                                                                                                                   | 2027                                                                                                                         | 2028                                                                                                             |
|------------------------------|------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| Wildfire Risk Framework      | Updated spatial risk model and tier designations are established as the common basis for program prioritization.       | Spatial and weather inputs are integrated, and outputs routinely govern all risk-based program priorities.                   | The framework is validated through repeated use and maintained through a documented annual calibration cycle.    |
| Operational Decision Support | Wildfire decision-support logic is aligned with the updated Risk Framework and supported by formalized IT processes.   | Operational teams routinely use integrated spatial and multi-hazard outlooks for readiness and event coordination.           | Year-round decision support is embedded in REU operations, with stable workflows, governance, and user adoption. |
| Vegetation Management        | Inspection, treatment, and condition triggers are standardized and linked to updated risk priorities.                  | Risk tiers and span-level condition data routinely drive treatment sequencing and performance review.                        | Accumulated GIS history supports predictive corridor planning and optimized treatment cycles.                    |
| Asset Inspection Program     | Inspection records, photographs, and corrective work tracking operate under strengthened, traceable standards.         | Condition data supports risk-based scheduling and validated use of enhanced inspection methods in higher-risk areas.         | Integrated condition monitoring and year-round scheduling support mature, preventive asset management.           |
| T&D Operational Practices    | Operating-state procedures, switch logs, and annual readiness exercises are aligned with updated risk classifications. | Operational controls are supported by improved sectionalizing and automation planning, with more consistent event execution. | Infrastructure and procedures enable more granular risk targeting with reduced manual switching burden.          |

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|                                 |                                                                                                                                             |                                                                                                                     |                                                                                                                           |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| System Hardening                | Annual targeting is aligned with updated risk tiers and supported by improved performance tracking.                                         | Risk-based prioritization and asset-level outage and ignition tracking are routine program practices.               | Multiple years of targeted investment provide measurable evidence of persistent risk reduction.                           |
| Fire Mitigation System Upgrades | A repeatable engineering decision framework guides selection and sequencing of circuit-level mitigation strategies.                         | Priority projects advance through a standardized pipeline from risk identification through design and construction. | A sustained capital delivery program deploys multiple risk-reduction technologies on priority circuits.                   |
| Fire-Retardant Pole Wrap        | The target population and inspection standards are established, with complete asset records and a formal maintenance cycle.                 | Condition inspections and maintenance decisions are routinely managed through GIS-based records.                    | The program operates as a stable, condition-based asset protection and maintenance cycle.                                 |
| Governance & Compliance         | Portfolio governance, independent evaluation, regulatory filing, and quantitative performance reporting operate under established controls. | Corrective action, calendar tracking, and program reporting are consistently applied across all programs.           | Continuous improvement, auditability, and evidence-based portfolio oversight are embedded in routine management practice. |

### 12.3 Lagging Indicator Trajectory

REU's three primary portfolio-level lagging indicators, utility-attributed wildfire ignitions, equipment-related wires-down events, and PSPS activations are used to assess the portfolio's effectiveness. The 2025 result of one ignition is the strongest lagging indicator outcome in REU's recorded history. Sustaining and improving on that result over the next three years, as the Risk Framework integration and capital programs take effect, is the portfolio's primary performance objective.

REU uses a zero-ignition target as an aspirational performance objective. Performance will be evaluated through year-over-year trends because weather and the inherent risks of energized infrastructure make absolute guarantees impractical. Each program is

expected to contribute measurably to that trend. The 2026 target of zero ignitions reflects the direction of REU's investment and continuous-improvement efforts.

### 12.4 Governance and Compliance Maturity

REU's governance framework was substantially formalized in 2025 with the establishment of the two-part charter system across all eleven programs. The 2026–2028 governance maturity trajectory includes:

- Completion of the first full independent evaluation cycle in 2026, with all findings and REU's responses publicly posted
- Refinement of corrective action tracking and closeout processes so that findings from events, audits, and program reviews are consistently logged and resolved
- Strengthening of formal after-action review requirements for all wildfire-related events, building a documented performance record that supports continuous improvement
- Continued improvement in data collection and metric standardization aligned with the CMUA Performance Metrics Template
- Transition from establishment-year baseline tracking to full quantitative performance metric reporting across all programs by the 2027 program year

## **13. Plan Adoption and Public Accountability**

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This section documents the public process through which the 2026 WMP is reviewed, adopted, and made available to the community.

### **13.1 City Council Adoption**

The City of Redding is governed by a council-manager form of government. The Redding City Council serves as REU's Utility Commission and has direct oversight authority over the Wildfire Mitigation Plan. The Council meets on the first and third Tuesdays of each month in open session with opportunity for public comment. All meetings are streamed live online and archived for public access.

The 2026 WMP is presented to City Council for review and adoption as part of REU's annual wildfire mitigation update, with 2026 City Council adoption targeted for August 18, 2026. City Council adoption is required before the plan is filed with the Wildfire Safety Advisory Board.

### **13.2 Public Posting and Accessibility**

Following City Council adoption, the 2026 WMP is posted on REU's public website at the address below. The document is prepared to meet digital accessibility standards: machine-readable text, alt text on all figures, and a hyperlinked table of contents. Members of the public may request printed copies or provide feedback through the contact information on the cover page.

### **13.3 Independent Evaluator Report**

California Public Utilities Code Section 8387 requires all publicly owned utilities to obtain an independent evaluation of their Wildfire Mitigation Plan every four years. In compliance with this requirement, REU engaged Dudek to complete the 2026 independent evaluation. The independent evaluator's findings, along with REU's written response, are publicly posted on REU's website following City Council adoption.

Dudek, serving as the qualified independent evaluator, reviewed Redding Electric Utility's 2026–2029 Wildfire Mitigation Plan to determine whether it satisfies all applicable statutory requirements, accurately characterizes wildfire risk and risk drivers within REU's service territory, and identifies mitigation strategies that are appropriately responsive to those risks.

The Independent Evaluator found that REU operates within an elevated wildfire risk environment due to the combination of local terrain, vegetation, seasonal fire weather patterns, and overhead electric facilities located in or near high fire hazard areas. The evaluation concluded that the plan meets all requirements of Public Utilities Code Section

## REU 2026 Wildfire Mitigation Plan

8387 and reflects a risk-informed approach to wildfire prevention, operational readiness, and system resiliency.

The evaluator highlighted key elements of REU's wildfire mitigation framework, including its use of fire weather and risk monitoring tools, partnerships with local fire agencies, Operating State protocols, targeted vegetation management, asset inspection programs, system hardening initiatives, fire-retardant pole wrapping, and Public Safety Power Shutoff (PSPS) procedures. The review also noted that REU integrates its PSPS process within the broader Operating State and situational-awareness framework.

Overall, the Independent Evaluator concluded that REU's 2026–2029 Wildfire Mitigation Plan is comprehensive and demonstrates a proactive, risk-informed, and operationally integrated strategy for reducing the likelihood and consequences of utility-related wildfire ignitions.

[https://www.cityofredding.gov/government/departments/redding\\_electric\\_utility/in\\_our\\_community/electric\\_safety/wildfire\\_mitigation\\_plan.php](https://www.cityofredding.gov/government/departments/redding_electric_utility/in_our_community/electric_safety/wildfire_mitigation_plan.php)

### 13.4 WSAB Filing

The 2026 WMP constitutes REU's biennial comprehensive revision as required by PUC 8387. Following the City Council adoption described in Section 13.1, REU submits the biennial comprehensive revision to the WSAB through the OEIS portal by the applicable deadline.

### 13.5 Revision History

The table below documents the revision history of REU's Wildfire Mitigation Plan.

| Version | Date              | Author | Description                              |
|---------|-------------------|--------|------------------------------------------|
| 1.0     | December 1, 2020  | REU    | Original document                        |
| 2.0     | December 7, 2021  | REU    | 2021 Monitoring & Auditing Annual Report |
| 3.0     | December 30, 2022 | REU    | 2022 Monitoring & Auditing Annual Report |
| 4.0     | December 5, 2023  | REU    | 2023 Monitoring & Auditing Annual Report |
| 5.0     | December 15, 2024 | REU    | 2024 Monitoring & Auditing Annual Report |

## REU 2026 Wildfire Mitigation Plan

| Version | Date            | Author | Description                                                                                                                                                     |
|---------|-----------------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8.0     | May 1, 2025     | REU    | 2025 Wildfire Mitigation Plan - comprehensive revision. Versions 6.0 and 7.0 were internal interim working drafts and were excluded from external distribution. |
| 9.0     | August 18, 2026 | REU    | 2026 Wildfire Mitigation Plan - comprehensive revision                                                                                                          |

## Appendix A – ODS Nightly Report Example

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### REU Fire Weather Forecast

2026-04-02 - 2026-04-09

#### Active National Weather Service Alerts

| Active National Weather Service Alert       | Generated        |
|---------------------------------------------|------------------|
| No active alerts for zones: CAZ015, CAZ215. | 2026-04-02 11:48 |

**⚠ This is a demonstration report. Wind speeds were increased by 15 mph, and FPI Prime values were increased by 0.35 to simulate extreme fire weather.**

*Report generated on 2026-04-02 11:48*

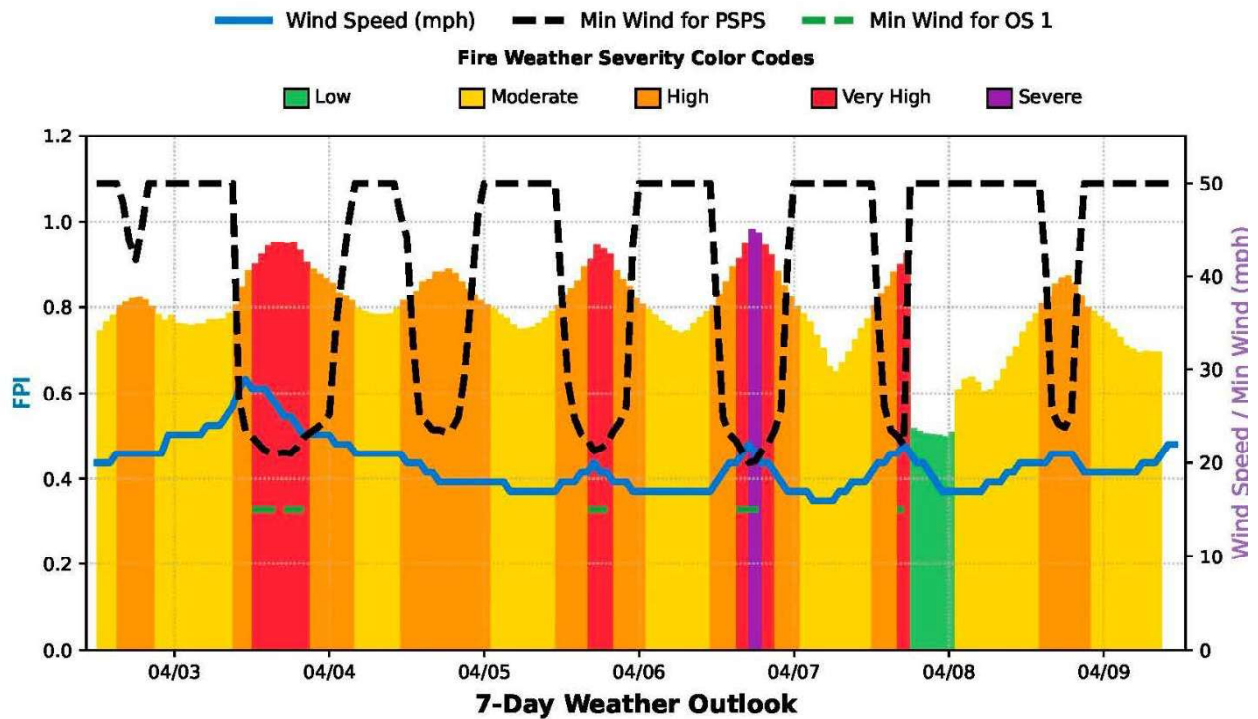
*Title page for a demonstration REU Fire Weather Forecast showing the report period, National Weather Service alert status, and a notice that wind speeds and FPI Prime values were increased to simulate extreme fire weather.*

Forecast Operating States

| DateTime            | State | Description                                    |
|---------------------|-------|------------------------------------------------|
| 2026-04-02 12:00:00 | 0     | Operating State 0 -- Normal Operations         |
| 2026-04-03 10:00:00 | 2     | Operating State 2 -- Extreme Fire Risk + Wind  |
| 2026-04-04 08:00:00 | 0     | Operating State 0 -- Normal Operations         |
| 2026-04-05 16:00:00 | 1     | Operating State 1 -- Elevated Fire Risk + Wind |
| 2026-04-05 20:00:00 | 0     | Operating State 0 -- Normal Operations         |
| 2026-04-06 15:00:00 | 1     | Operating State 1 -- Elevated Fire Risk + Wind |
| 2026-04-06 21:00:00 | 0     | Operating State 0 -- Normal Operations         |
| 2026-04-07 16:00:00 | 1     | Operating State 1 -- Elevated Fire Risk + Wind |
| 2026-04-07 18:00:00 | 0     | Operating State 0 -- Normal Operations         |
| 2026-04-09 11:00:00 | 0     | Operating State 0 -- Normal Operations         |

*Description: Small table listing forecast operating state changes by date and time, including normal operations, elevated fire risk with wind, and extreme fire risk with wind.*

## FPI Prime Daily Avg & Wind

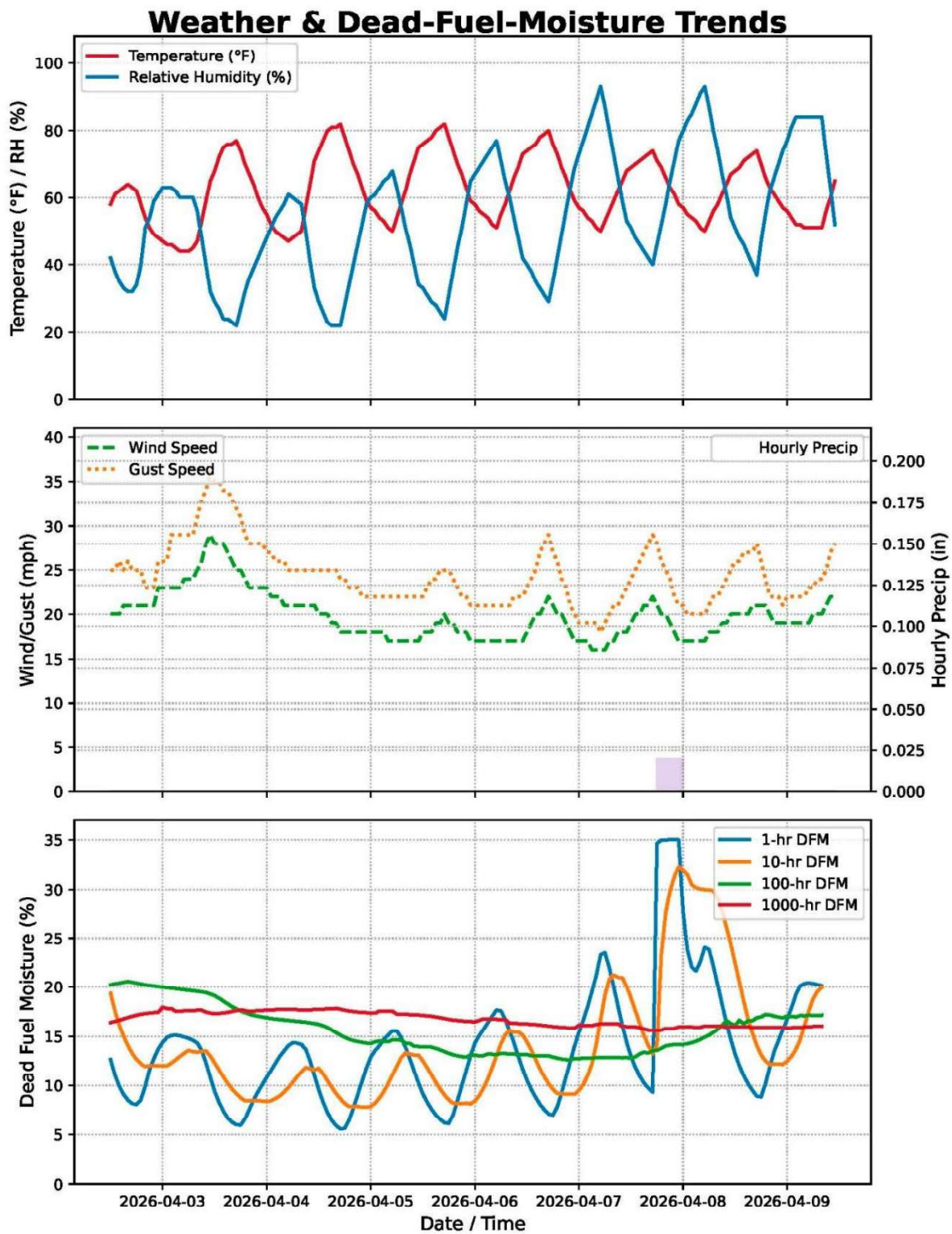


| DateTime   | Max_Temp | Min_Temp | Avg_Temp | Max_Wind | Avg_Wind | Max_Gust | Min_RH | Avg_RH | Precip |
|------------|----------|----------|----------|----------|----------|----------|--------|--------|--------|
| 2026-04-02 | 64       | 48       | 57.8     | 23.0     | 20.9     | 26.0     | 32     | 42.6   | 0.0    |
| 2026-04-03 | 77       | 44       | 59.2     | 29.0     | 24.9     | 36.0     | 22     | 43.2   | 0.0    |
| 2026-04-04 | 82       | 47       | 63.6     | 23.0     | 20.0     | 27.0     | 22     | 43.0   | 0.0    |
| 2026-04-05 | 82       | 50       | 66.4     | 20.0     | 17.9     | 25.0     | 24     | 47.2   | 0.0    |
| 2026-04-06 | 80       | 51       | 65.7     | 22.0     | 18.3     | 29.0     | 29     | 53.8   | 0.0    |
| 2026-04-07 | 74       | 50       | 62.5     | 22.0     | 18.4     | 29.0     | 40     | 64.8   | 0.1    |
| 2026-04-08 | 74       | 50       | 61.8     | 21.0     | 19.0     | 28.0     | 37     | 65.9   | 0.0    |
| 2026-04-09 | 65       | 51       | 54.2     | 22.0     | 19.9     | 28.0     | 52     | 77.8   | 0.0    |

### Daily Fire-Weather Indices

| DateTime   | Mean_FPI | Max_FPI |
|------------|----------|---------|
| 2026-04-02 | 0.793    | 0.824   |
| 2026-04-03 | 0.854    | 0.953   |
| 2026-04-04 | 0.831    | 0.889   |
| 2026-04-05 | 0.828    | 0.945   |
| 2026-04-06 | 0.838    | 0.982   |
| 2026-04-07 | 0.707    | 0.927   |
| 2026-04-08 | 0.728    | 0.875   |
| 2026-04-09 | 0.715    | 0.764   |

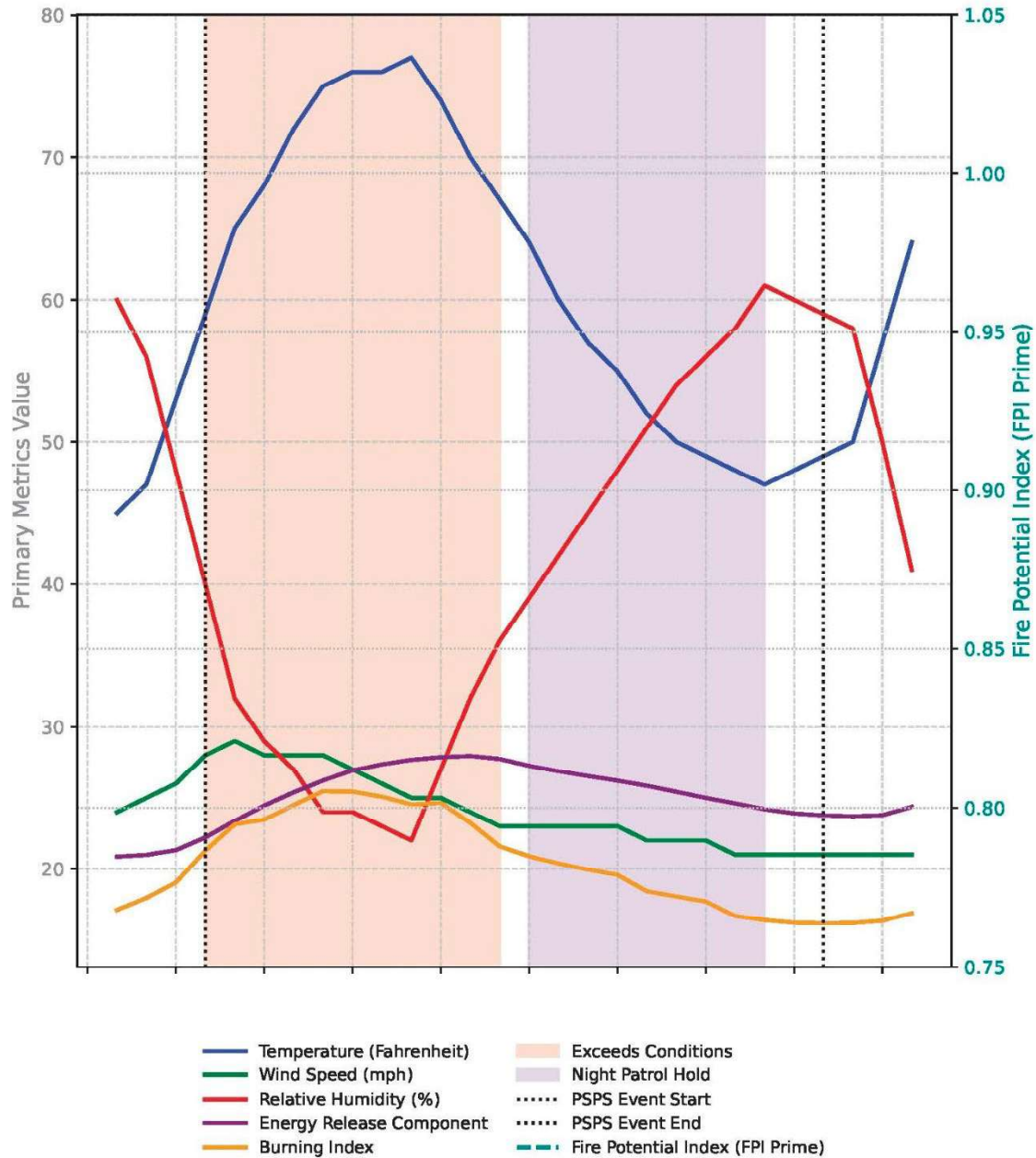
Description: Seven-day weather outlook chart showing FPI Prime, wind speed, minimum wind thresholds for PSPS and Operating State 1, and fire weather severity color bands, with supporting daily weather and fire-weather index tables.



Description: Three-panel chart showing forecast temperature and relative humidity, wind and gust speed with hourly precipitation, and dead fuel moisture trends for 1-hour, 10-hour, 100-hour, and 1000-hour fuels.

## REU 2026 Wildfire Mitigation Plan

### Conditions During PSPS Event 1 04/03/2026 10:00:00 AM to 04/04/2026 07:00:00 AM (3-hour buffer shown)



Description: Line chart showing conditions during a simulated PSPS event, including temperature, relative humidity, wind speed, energy release component, burning index, and FPI Prime, with shaded periods for exceedance conditions and night patrol hold.

## Appendix B – Operational Dashboard State Table Dashboard

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*The following charts show a detailed operating state table showing hourly forecast values for wind, operating state thresholds, fire weather index values, severity level, exceedance status, operating state, nighttime status, and lifecycle status. As values change, the lifecycle status changes from Normal to Pre-PSPS, Active, Night hold, or Deescalate.*

## Operating State Detail Appendix

Full hourly forecast shown because Exceeds Conditions occurs in the forecast

| Local Time       | Wind | OS1 Min | OS2 Min | RFW | FPI   | Severity  | Exceeds | Operating State | Dark | Lifecycle  |
|------------------|------|---------|---------|-----|-------|-----------|---------|-----------------|------|------------|
| 2026-04-02 12:00 | 20.0 |         | 50.0    |     | 0.746 | Moderate  |         | OS0             |      | Normal     |
| 2026-04-02 13:00 | 20.0 |         | 50.0    |     | 0.766 | Moderate  |         | OS0             |      | Normal     |
| 2026-04-02 14:00 | 20.0 |         | 50.0    |     | 0.783 | Moderate  |         | OS0             |      | Normal     |
| 2026-04-02 15:00 | 21.0 |         | 50.0    |     | 0.805 | High      |         | OS0             |      | Normal     |
| 2026-04-02 16:00 | 21.0 |         | 47.9    |     | 0.814 | High      |         | OS0             |      | Normal     |
| 2026-04-02 17:00 | 21.0 |         | 43.7    |     | 0.821 | High      |         | OS0             |      | Normal     |
| 2026-04-02 18:00 | 21.0 |         | 41.8    |     | 0.824 | High      |         | OS0             |      | Normal     |
| 2026-04-02 19:00 | 21.0 |         | 45.5    |     | 0.818 | High      |         | OS0             |      | Normal     |
| 2026-04-02 20:00 | 21.0 |         | 50.0    |     | 0.802 | High      |         | OS0             | Yes  | Normal     |
| 2026-04-02 21:00 | 21.0 |         | 50.0    |     | 0.783 | Moderate  |         | OS0             | Yes  | Normal     |
| 2026-04-02 22:00 | 21.0 |         | 50.0    |     | 0.770 | Moderate  |         | OS0             | Yes  | Normal     |
| 2026-04-02 23:00 | 23.0 |         | 50.0    |     | 0.782 | Moderate  |         | OS0             | Yes  | Normal     |
| 2026-04-03 00:00 | 23.0 |         | 50.0    |     | 0.763 | Moderate  |         | OS0             | Yes  | Normal     |
| 2026-04-03 01:00 | 23.0 |         | 50.0    |     | 0.761 | Moderate  |         | OS0             | Yes  | Normal     |
| 2026-04-03 02:00 | 23.0 |         | 50.0    |     | 0.757 | Moderate  |         | OS0             | Yes  | Normal     |
| 2026-04-03 03:00 | 23.0 |         | 50.0    |     | 0.762 | Moderate  |         | OS0             | Yes  | Normal     |
| 2026-04-03 04:00 | 23.0 |         | 50.0    |     | 0.761 | Moderate  |         | OS0             | Yes  | Normal     |
| 2026-04-03 05:00 | 24.0 |         | 50.0    |     | 0.771 | Moderate  |         | OS0             | Yes  | Normal     |
| 2026-04-03 06:00 | 24.0 |         | 50.0    |     | 0.771 | Moderate  |         | OS0             |      | Normal     |
| 2026-04-03 07:00 | 24.0 |         | 50.0    |     | 0.774 | Moderate  |         | OS0             |      | Normal     |
| 2026-04-03 08:00 | 25.0 |         | 50.0    |     | 0.787 | Moderate  |         | OS0             |      | Pre-PSPS   |
| 2026-04-03 09:00 | 26.0 |         | 50.0    |     | 0.806 | High      |         | OS0             |      | Pre-PSPS   |
| 2026-04-03 10:00 | 28.0 |         | 26.9    |     | 0.848 | High      | Yes     | OS2             |      | Active     |
| 2026-04-03 11:00 | 29.0 |         | 23.4    |     | 0.886 | High      | Yes     | OS2             |      | Active     |
| 2026-04-03 12:00 | 28.0 | 15.0    | 22.8    |     | 0.902 | Very High | Yes     | OS2             |      | Active     |
| 2026-04-03 13:00 | 28.0 | 15.0    | 22.0    |     | 0.924 | Very High | Yes     | OS2             |      | Active     |
| 2026-04-03 14:00 | 28.0 | 15.0    | 21.3    |     | 0.944 | Very High | Yes     | OS2             |      | Active     |
| 2026-04-03 15:00 | 27.0 | 15.0    | 21.0    |     | 0.952 | Very High | Yes     | OS2             |      | Active     |
| 2026-04-03 16:00 | 26.0 | 15.0    | 21.0    |     | 0.952 | Very High | Yes     | OS2             |      | Active     |
| 2026-04-03 17:00 | 25.0 | 15.0    | 21.1    |     | 0.949 | Very High | Yes     | OS2             |      | Active     |
| 2026-04-03 18:00 | 25.0 | 15.0    | 21.0    |     | 0.953 | Very High | Yes     | OS2             |      | Active     |
| 2026-04-03 19:00 | 24.0 | 15.0    | 21.7    |     | 0.934 | Very High | Yes     | OS2             |      | Active     |
| 2026-04-03 20:00 | 23.0 | 15.0    | 22.7    |     | 0.906 | Very High | Yes     | OS2             | Yes  | Active     |
| 2026-04-03 21:00 | 23.0 |         | 23.3    |     | 0.890 | High      |         | OS2             | Yes  | Night Hold |
| 2026-04-03 22:00 | 23.0 |         | 23.7    |     | 0.878 | High      |         | OS2             | Yes  | Night Hold |
| 2026-04-03 23:00 | 23.0 |         | 24.3    |     | 0.867 | High      |         | OS2             | Yes  | Night Hold |
| 2026-04-04 00:00 | 23.0 |         | 25.2    |     | 0.858 | High      |         | OS2             | Yes  | Night Hold |
| 2026-04-04 01:00 | 22.0 |         | 34.5    |     | 0.836 | High      |         | OS2             | Yes  | Night Hold |
| 2026-04-04 02:00 | 22.0 |         | 40.4    |     | 0.826 | High      |         | OS2             | Yes  | Night Hold |
| 2026-04-04 03:00 | 22.0 |         | 45.9    |     | 0.817 | High      |         | OS2             | Yes  | Night Hold |
| 2026-04-04 04:00 | 21.0 |         | 50.0    |     | 0.798 | Moderate  |         | OS2             | Yes  | Night Hold |
| 2026-04-04 05:00 | 21.0 |         | 50.0    |     | 0.790 | Moderate  |         | OS2             | Yes  | Night Hold |

## Operating State Detail Appendix

Full hourly forecast shown because Exceeds Conditions occurs in the forecast

| Local Time       | Wind | OS1 Min | OS2 Min | RFW | FPI   | Severity  | Exceeds | Operating State | Dark | Lifecycle   |
|------------------|------|---------|---------|-----|-------|-----------|---------|-----------------|------|-------------|
| 2026-04-04 06:00 | 21.0 |         | 50.0    |     | 0.785 | Moderate  |         | OS2             |      | De-escalate |
| 2026-04-04 07:00 | 21.0 |         | 50.0    |     | 0.783 | Moderate  |         | OS2             |      | De-escalate |
| 2026-04-04 08:00 | 21.0 |         | 50.0    |     | 0.783 | Moderate  |         | OS0             |      | Normal      |
| 2026-04-04 09:00 | 21.0 |         | 50.0    |     | 0.786 | Moderate  |         | OS0             |      | Normal      |
| 2026-04-04 10:00 | 21.0 |         | 50.0    |     | 0.799 | Moderate  |         | OS0             |      | Normal      |
| 2026-04-04 11:00 | 21.0 |         | 46.6    |     | 0.816 | High      |         | OS0             |      | Normal      |
| 2026-04-04 12:00 | 20.0 |         | 44.2    |     | 0.820 | High      |         | OS0             |      | Normal      |
| 2026-04-04 13:00 | 20.0 |         | 32.5    |     | 0.839 | High      |         | OS0             |      | Normal      |
| 2026-04-04 14:00 | 20.0 |         | 24.9    |     | 0.861 | High      |         | OS0             |      | Normal      |
| 2026-04-04 15:00 | 19.0 |         | 24.4    |     | 0.866 | High      |         | OS0             |      | Normal      |
| 2026-04-04 16:00 | 19.0 |         | 23.5    |     | 0.883 | High      |         | OS0             |      | Normal      |
| 2026-04-04 17:00 | 18.0 |         | 23.5    |     | 0.883 | High      |         | OS0             |      | Normal      |
| 2026-04-04 18:00 | 18.0 |         | 23.3    |     | 0.889 | High      |         | OS0             |      | Normal      |
| 2026-04-04 19:00 | 18.0 |         | 23.6    |     | 0.880 | High      |         | OS0             |      | Normal      |
| 2026-04-04 20:00 | 18.0 |         | 24.9    |     | 0.861 | High      |         | OS0             | Yes  | Normal      |
| 2026-04-04 21:00 | 18.0 |         | 29.8    |     | 0.844 | High      |         | OS0             | Yes  | Normal      |
| 2026-04-04 22:00 | 18.0 |         | 38.3    |     | 0.830 | High      |         | OS0             | Yes  | Normal      |
| 2026-04-04 23:00 | 18.0 |         | 46.4    |     | 0.816 | High      |         | OS0             | Yes  | Normal      |
| 2026-04-05 00:00 | 18.0 |         | 50.0    |     | 0.805 | High      |         | OS0             | Yes  | Normal      |
| 2026-04-05 01:00 | 18.0 |         | 50.0    |     | 0.797 | Moderate  |         | OS0             | Yes  | Normal      |
| 2026-04-05 02:00 | 18.0 |         | 50.0    |     | 0.784 | Moderate  |         | OS0             | Yes  | Normal      |
| 2026-04-05 03:00 | 18.0 |         | 50.0    |     | 0.775 | Moderate  |         | OS0             | Yes  | Normal      |
| 2026-04-05 04:00 | 17.0 |         | 50.0    |     | 0.759 | Moderate  |         | OS0             | Yes  | Normal      |
| 2026-04-05 05:00 | 17.0 |         | 50.0    |     | 0.750 | Moderate  |         | OS0             | Yes  | Normal      |
| 2026-04-05 06:00 | 17.0 |         | 50.0    |     | 0.751 | Moderate  |         | OS0             |      | Normal      |
| 2026-04-05 07:00 | 17.0 |         | 50.0    |     | 0.754 | Moderate  |         | OS0             |      | Normal      |
| 2026-04-05 08:00 | 17.0 |         | 50.0    |     | 0.763 | Moderate  |         | OS0             |      | Normal      |
| 2026-04-05 09:00 | 17.0 |         | 50.0    |     | 0.775 | Moderate  |         | OS0             |      | Normal      |
| 2026-04-05 10:00 | 17.0 |         | 50.0    |     | 0.790 | Moderate  |         | OS0             |      | Normal      |
| 2026-04-05 11:00 | 17.0 |         | 50.0    |     | 0.803 | High      |         | OS0             |      | Normal      |
| 2026-04-05 12:00 | 18.0 |         | 38.1    |     | 0.830 | High      |         | OS0             |      | Normal      |
| 2026-04-05 13:00 | 18.0 |         | 28.6    |     | 0.846 | High      |         | OS0             |      | Normal      |
| 2026-04-05 14:00 | 18.0 |         | 24.8    |     | 0.862 | High      |         | OS0             |      | Normal      |
| 2026-04-05 15:00 | 19.0 |         | 23.1    |     | 0.894 | High      |         | OS0             |      | Normal      |
| 2026-04-05 16:00 | 19.0 | 15.0    | 22.5    |     | 0.911 | Very High |         | OS1             |      | Normal      |
| 2026-04-05 17:00 | 20.0 | 15.0    | 21.3    |     | 0.945 | Very High |         | OS1             |      | Normal      |
| 2026-04-05 18:00 | 19.0 | 15.0    | 21.6    |     | 0.937 | Very High |         | OS1             |      | Normal      |
| 2026-04-05 19:00 | 19.0 | 15.0    | 22.0    |     | 0.924 | Very High |         | OS1             |      | Normal      |
| 2026-04-05 20:00 | 18.0 |         | 23.4    |     | 0.887 | High      |         | OS0             | Yes  | Normal      |
| 2026-04-05 21:00 | 18.0 |         | 24.3    |     | 0.867 | High      |         | OS0             | Yes  | Normal      |
| 2026-04-05 22:00 | 18.0 |         | 26.0    |     | 0.850 | High      |         | OS0             | Yes  | Normal      |
| 2026-04-05 23:00 | 17.0 |         | 43.1    |     | 0.821 | High      |         | OS0             | Yes  | Normal      |

## Operating State Detail Appendix

Full hourly forecast shown because Exceeds Conditions occurs in the forecast

| Local Time       | Wind | OS1 Min | OS2 Min | RFW | FPI   | Severity  | Exceeds | Operating State | Dark | Lifecycle |
|------------------|------|---------|---------|-----|-------|-----------|---------|-----------------|------|-----------|
| 2026-04-06 00:00 | 17.0 |         | 50.0    |     | 0.808 | High      |         | OS0             | Yes  | Normal    |
| 2026-04-06 01:00 | 17.0 |         | 50.0    |     | 0.795 | Moderate  |         | OS0             | Yes  | Normal    |
| 2026-04-06 02:00 | 17.0 |         | 50.0    |     | 0.781 | Moderate  |         | OS0             | Yes  | Normal    |
| 2026-04-06 03:00 | 17.0 |         | 50.0    |     | 0.769 | Moderate  |         | OS0             | Yes  | Normal    |
| 2026-04-06 04:00 | 17.0 |         | 50.0    |     | 0.757 | Moderate  |         | OS0             | Yes  | Normal    |
| 2026-04-06 05:00 | 17.0 |         | 50.0    |     | 0.746 | Moderate  |         | OS0             | Yes  | Normal    |
| 2026-04-06 06:00 | 17.0 |         | 50.0    |     | 0.741 | Moderate  |         | OS0             |      | Normal    |
| 2026-04-06 07:00 | 17.0 |         | 50.0    |     | 0.747 | Moderate  |         | OS0             |      | Normal    |
| 2026-04-06 08:00 | 17.0 |         | 50.0    |     | 0.763 | Moderate  |         | OS0             |      | Normal    |
| 2026-04-06 09:00 | 17.0 |         | 50.0    |     | 0.777 | Moderate  |         | OS0             |      | Normal    |
| 2026-04-06 10:00 | 17.0 |         | 50.0    |     | 0.790 | Moderate  |         | OS0             |      | Normal    |
| 2026-04-06 11:00 | 17.0 |         | 50.0    |     | 0.804 | High      |         | OS0             |      | Normal    |
| 2026-04-06 12:00 | 18.0 |         | 37.1    |     | 0.831 | High      |         | OS0             |      | Normal    |
| 2026-04-06 13:00 | 19.0 |         | 24.9    |     | 0.861 | High      |         | OS0             |      | Normal    |
| 2026-04-06 14:00 | 20.0 |         | 23.1    |     | 0.895 | High      |         | OS0             |      | Normal    |
| 2026-04-06 15:00 | 20.0 | 15.0    | 22.4    |     | 0.914 | Very High |         | OS1             |      | Normal    |
| 2026-04-06 16:00 | 21.0 | 15.0    | 21.1    |     | 0.949 | Very High |         | OS1             |      | Normal    |
| 2026-04-06 17:00 | 22.0 | 15.0    | 20.0    |     | 0.982 | Severe    | Yes     | OS1             |      | Normal    |
| 2026-04-06 18:00 | 21.0 | 15.0    | 20.2    |     | 0.975 | Severe    | Yes     | OS1             |      | Normal    |
| 2026-04-06 19:00 | 20.0 | 15.0    | 21.3    |     | 0.945 | Very High |         | OS1             |      | Normal    |
| 2026-04-06 20:00 | 20.0 | 15.0    | 22.1    |     | 0.922 | Very High |         | OS1             | Yes  | Normal    |
| 2026-04-06 21:00 | 19.0 |         | 23.5    |     | 0.885 | High      |         | OS0             | Yes  | Normal    |
| 2026-04-06 22:00 | 18.0 |         | 25.7    |     | 0.853 | High      |         | OS0             | Yes  | Normal    |
| 2026-04-06 23:00 | 17.0 |         | 41.5    |     | 0.824 | High      |         | OS0             | Yes  | Normal    |
| 2026-04-07 00:00 | 17.0 |         | 50.0    |     | 0.802 | High      |         | OS0             | Yes  | Normal    |
| 2026-04-07 01:00 | 17.0 |         | 50.0    |     | 0.786 | Moderate  |         | OS0             | Yes  | Normal    |
| 2026-04-07 02:00 | 17.0 |         | 50.0    |     | 0.766 | Moderate  |         | OS0             | Yes  | Normal    |
| 2026-04-07 03:00 | 16.0 |         | 50.0    |     | 0.736 | Moderate  |         | OS0             | Yes  | Normal    |
| 2026-04-07 04:00 | 16.0 |         | 50.0    |     | 0.704 | Moderate  |         | OS0             | Yes  | Normal    |
| 2026-04-07 05:00 | 16.0 |         | 50.0    |     | 0.661 | Moderate  |         | OS0             | Yes  | Normal    |
| 2026-04-07 06:00 | 16.0 |         | 50.0    |     | 0.650 | Moderate  |         | OS0             |      | Normal    |
| 2026-04-07 07:00 | 17.0 |         | 50.0    |     | 0.670 | Moderate  |         | OS0             |      | Normal    |
| 2026-04-07 08:00 | 17.0 |         | 50.0    |     | 0.695 | Moderate  |         | OS0             |      | Normal    |
| 2026-04-07 09:00 | 18.0 |         | 50.0    |     | 0.726 | Moderate  |         | OS0             |      | Normal    |
| 2026-04-07 10:00 | 18.0 |         | 50.0    |     | 0.751 | Moderate  |         | OS0             |      | Normal    |
| 2026-04-07 11:00 | 18.0 |         | 50.0    |     | 0.773 | Moderate  |         | OS0             |      | Normal    |
| 2026-04-07 12:00 | 19.0 |         | 50.0    |     | 0.804 | High      |         | OS0             |      | Normal    |
| 2026-04-07 13:00 | 20.0 |         | 36.0    |     | 0.833 | High      |         | OS0             |      | Normal    |
| 2026-04-07 14:00 | 20.0 |         | 26.0    |     | 0.850 | High      |         | OS0             |      | Normal    |
| 2026-04-07 15:00 | 21.0 |         | 23.5    |     | 0.883 | High      |         | OS0             |      | Normal    |
| 2026-04-07 16:00 | 21.0 | 15.0    | 22.9    |     | 0.901 | Very High |         | OS1             |      | Normal    |
| 2026-04-07 17:00 | 22.0 | 15.0    | 21.9    |     | 0.927 | Very High | Yes     | OS1             |      | Normal    |

## Operating State Detail Appendix

Full hourly forecast shown because Exceeds Conditions occurs in the forecast

| Local Time       | Wind | OS1 Min | OS2 Min | RFW | FPI   | Severity | Exceeds | Operating State | Dark | Lifecycle |
|------------------|------|---------|---------|-----|-------|----------|---------|-----------------|------|-----------|
| 2026-04-07 18:00 | 21.0 |         | 50.0    |     | 0.518 | Low      |         | OS0             |      | Normal    |
| 2026-04-07 19:00 | 20.0 |         | 50.0    |     | 0.511 | Low      |         | OS0             |      | Normal    |
| 2026-04-07 20:00 | 20.0 |         | 50.0    |     | 0.506 | Low      |         | OS0             | Yes  | Normal    |
| 2026-04-07 21:00 | 19.0 |         | 50.0    |     | 0.504 | Low      |         | OS0             | Yes  | Normal    |
| 2026-04-07 22:00 | 18.0 |         | 50.0    |     | 0.502 | Low      |         | OS0             | Yes  | Normal    |
| 2026-04-07 23:00 | 17.0 |         | 50.0    |     | 0.499 | Low      |         | OS0             | Yes  | Normal    |
| 2026-04-08 00:00 | 17.0 |         | 50.0    |     | 0.509 | Low      |         | OS0             | Yes  | Normal    |
| 2026-04-08 01:00 | 17.0 |         | 50.0    |     | 0.608 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-08 02:00 | 17.0 |         | 50.0    |     | 0.632 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-08 03:00 | 17.0 |         | 50.0    |     | 0.638 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-08 04:00 | 17.0 |         | 50.0    |     | 0.625 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-08 05:00 | 17.0 |         | 50.0    |     | 0.605 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-08 06:00 | 18.0 |         | 50.0    |     | 0.609 | Moderate |         | OS0             |      | Normal    |
| 2026-04-08 07:00 | 18.0 |         | 50.0    |     | 0.630 | Moderate |         | OS0             |      | Normal    |
| 2026-04-08 08:00 | 18.0 |         | 50.0    |     | 0.654 | Moderate |         | OS0             |      | Normal    |
| 2026-04-08 09:00 | 19.0 |         | 50.0    |     | 0.684 | Moderate |         | OS0             |      | Normal    |
| 2026-04-08 10:00 | 19.0 |         | 50.0    |     | 0.708 | Moderate |         | OS0             |      | Normal    |
| 2026-04-08 11:00 | 20.0 |         | 50.0    |     | 0.742 | Moderate |         | OS0             |      | Normal    |
| 2026-04-08 12:00 | 20.0 |         | 50.0    |     | 0.767 | Moderate |         | OS0             |      | Normal    |
| 2026-04-08 13:00 | 20.0 |         | 50.0    |     | 0.785 | Moderate |         | OS0             |      | Normal    |
| 2026-04-08 14:00 | 20.0 |         | 50.0    |     | 0.809 | High     |         | OS0             |      | Normal    |
| 2026-04-08 15:00 | 20.0 |         | 41.0    |     | 0.825 | High     |         | OS0             |      | Normal    |
| 2026-04-08 16:00 | 21.0 |         | 25.5    |     | 0.855 | High     |         | OS0             |      | Normal    |
| 2026-04-08 17:00 | 21.0 |         | 24.1    |     | 0.869 | High     |         | OS0             |      | Normal    |
| 2026-04-08 18:00 | 21.0 |         | 23.8    |     | 0.875 | High     |         | OS0             |      | Normal    |
| 2026-04-08 19:00 | 21.0 |         | 25.2    |     | 0.858 | High     |         | OS0             |      | Normal    |
| 2026-04-08 20:00 | 20.0 |         | 40.1    |     | 0.827 | High     |         | OS0             | Yes  | Normal    |
| 2026-04-08 21:00 | 19.0 |         | 50.0    |     | 0.800 | High     |         | OS0             | Yes  | Normal    |
| 2026-04-08 22:00 | 19.0 |         | 50.0    |     | 0.790 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-08 23:00 | 19.0 |         | 50.0    |     | 0.779 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-09 00:00 | 19.0 |         | 50.0    |     | 0.764 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-09 01:00 | 19.0 |         | 50.0    |     | 0.749 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-09 02:00 | 19.0 |         | 50.0    |     | 0.730 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-09 03:00 | 19.0 |         | 50.0    |     | 0.712 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-09 04:00 | 19.0 |         | 50.0    |     | 0.702 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-09 05:00 | 19.0 |         | 50.0    |     | 0.694 | Moderate |         | OS0             | Yes  | Normal    |
| 2026-04-09 06:00 | 20.0 |         | 50.0    |     | 0.696 | Moderate |         | OS0             |      | Normal    |
| 2026-04-09 07:00 | 20.0 |         | 50.0    |     | 0.695 | Moderate |         | OS0             |      | Normal    |
| 2026-04-09 08:00 | 20.0 |         | 50.0    |     | 0.694 | Moderate |         | OS0             |      | Normal    |
| 2026-04-09 09:00 | 21.0 |         | 50.0    |     |       | N/A      |         | OS0             |      | Normal    |
| 2026-04-09 10:00 | 22.0 |         | 50.0    |     |       | N/A      |         | OS0             |      | Normal    |
| 2026-04-09 11:00 | 22.0 |         | 50.0    |     |       | N/A      |         | OS0             |      | Normal    |

## NOTICE OF EXEMPTION

TO: ☒ Office of Planning and Research  
1400 Tenth Street, Room 121  
Sacramento, CA 95814

☒ Shasta County Clerk  
County of Shasta  
P.O. Box 990880, 1643 Market Street  
Redding, CA 96099-0880

FROM: City of Redding  
Public Works Department  
777 Cypress Avenue  
Redding, CA 96001

**Project Title:** Wildfire Mitigation Plan Update

**Project Location – Specific:** City of Redding

**Project Location – City:** Redding **Project Location – County:** Shasta

**Description of Project:** The Redding Electric Utility is updating the Wildfire Mitigation Plan Update, in compliance with California Senate Bill 901 and California Public Utilities Code Section 8387(b)(2) and Section 8387(c).

**Name of Public Agency Approving Project:** City of Redding

**Name of Person or Agency Carrying Out Project:** Nathan Aronson, Electric Program Supervisor

**Exempt Status:** *(check one)*

- ☐ Ministerial [Section 21080(b)(1); 15268]
- ☐ Declared Emergency [Section 21080(b)(3); 15269(a)]
- ☐ Emergency Project [Section 21080(b)(4); 15269(b)]
- ☐ Statutory Exemptions. State code number: \_\_\_\_\_
- ☒ Common Sense Exemption (This project does not fall within an exempt class, but it can be seen with certainty that there is no possibility that the activity may have a significant effect on the environment (14 CCR 15061[b][3]).
- ☐ Categorical Exemption. State type and section number: \_\_\_\_\_
  - ☐ No exceptions apply that would bar the use of a categorical exemption (PRD 21084 and 14 CCR 15300.2).

**Reasons why project is exempt:** CEQA applies only to projects which have the potential for causing a significant effect on the environment. The project has been reviewed and it can be seen with certainty that there is no possibility that the activity may have a significant effect on the environment; therefore, the activity is not subject to CEQA.

**Lead Agency Contact Person:** Amber Kelley

**Telephone:** 530.225.4046

**If Filed by Applicant:**

1. Attach certified document of exemption finding.
2. Has a notice of exemption been filed by the public agency approving the project? ☐ Yes ☐ No

**Signature:** Amber Kelley

**Date:** 8-10-2024

**Title:** Environmental Compliance Manager

☒ Signed by Lead Agency

Date received for filing at OPR: \_\_\_\_\_

☐ Signed by Applicant