
Independent Evaluator Report

Silicon Valley Power 2026-2028 Wildfire Mitigation Plan

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
CA	California
CAL FIRE	California Department of Forestry and Fire Protection
CPUC	California Public Utilities Commission
FEMS	Fire Environment Mapping System
FHSZ	Fire Hazard Severity Zone
HFTD	High Fire-Threat District
IEMS	Incident Emergency Management System
IOU	Investor-Owned Utility
n.d.	No date
NWS	National Weather Service
OEIS	Office of Energy Infrastructure Safety
ONCC	Northern California Geographic Area Coordination Center
PG&E	Pacific Gas and Electric Company
POU	Publicly Owned Utility
PUC	Public Utilities Code
SVP	Silicon Valley Power
WFTIIC	Wildland Fire Training and Information Center
WMP	Wildfire Mitigation Plan
WSAB	Wildfire Safety Advisory Board
WUI	Wildland-Urban Interface

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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 Silicon Valley Power (SVP) to review its current WMP, evaluate its ongoing and new wildfire mitigation strategies, and prepare this Independent Evaluator's Report for SVP's 2026–2028 WMP.

1.1 Scope and Intent

Dudek worked with SVP to prepare this Independent Evaluator's Report to satisfy the requirements of Public Utilities Code (PUC) Section 8387(c). This report is specific to SVP's 2026–2028 Wildfire Mitigation Plan. It reviews the elements within the WMP and presents the results of Dudek's review of data provided by SVP and publicly available data regarding wildfire risk in SVP's service territory and SVP's wildfire risk-reduction strategies. Dudek's review of the SVP WMP assessed the following elements:

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

This Independent Evaluator's Report is intended to satisfy the requirements of the PUC and provide SVP 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 SVP's WMP also focuses on risk identification and preemptive de-energization.

1.2 Changes to the WMP Submittal Process

The Wildfire Safety Advisory Board (WSAB) published several guidance documents in late 2025 and early 2026 that included information about changes to the WMP submittal process for publicly owned electric utilities. Changes to PUC Section 8387 revised the submittal frequency for POU WMPs from annually to every two years. To distribute the WMP review workload, the WSAB modified the submission dates for POU WMPs. The WSAB's new guidance establishes a staggered submittal process in which a select group of POUs submits its WMPs each year for WSAB review. In March 2026, the WSAB published the final WMP submittal schedule 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 its 2026–2029 WMP during the first week of October. SVP is in a group whose WMPs are due on October

2, 2026 (WSAB 2026). Under the new WMP submittal guidance, SVP's next WMP submittal date will be in October 2028.

The changes to the WSAB submittal schedule do not affect the requirement in PUC Section 8387(b)(3) that SVP present its WMP at an appropriately noticed public meeting to accept comments from the public and other agencies. Before submitting its 2026–2028 WMP, SVP staff will present the WMP at a public meeting.

1.3 Qualifications of the Independent Evaluator

PUC Section 8387(c) states that a public electric utility must contract with a qualified independent evaluator experienced in 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 throughout California 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 SVP's draft 2026–2028 Wildfire Mitigation Plan and discussions with SVP staff. These discussions, together with the WMP, informed Dudek's evaluation of SVP's service territory, utility-ignited wildfires, potential ignition events, and the wildfire risk drivers described in the WMP. Dudek also used 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 Utility Wildfire History (CPUC)

These datasets were used to assess the fire environment in SVP's service territory and independently verify the environmental wildfire risk drivers described in the WMP.

2 SVP Service Territory

2.1 SVP Service Territory & Fire Environment Summary

SVP's service territory consists of two elements. The first is the area within the boundaries of the City of Santa Clara and limited surrounding areas. Within this element, SVP provides electric service to approximately 62,447 customer accounts serving approximately 133,446 people in a 19.2-square-mile service territory. This portion of SVP's service

territory is almost entirely urbanized and lacks terrain or vegetation conducive to wildfire spread, regardless of the ignition source. The exception is a small area in the northern portion of the service territory near Highway 237, along Lafayette Street, where SVP has overhead lines that run along several large, undeveloped parcels covered by continuous grasslands. The customer base in this first element of the service territory includes:

- 86% residential customers by account count
- 11% small and medium businesses
- 2% commercial/industrial accounts

Although commercial and industrial customers represent only 2 percent of accounts, they account for approximately 92 percent of system load. The second element of SVP's service territory consists of the remote transmission assets owned by SVP. These remote assets are summarized in Table 1.

Table 1 SVP Remote Transmission Assets

Facility	Ownership/Operation	Location Notes
Grizzly Tie Line	Owned by SVP, operated by PG&E	Part of Bucks Creek Project in Plumas County
Black Butte Tie Line	Owned and operated by SVP	Part of the Black Butte Hydroelectric Project. Near the City of Orland, CA
Stony Gorge Tie Line	Owned and operated by SVP	Part of the Stony Gorge Hydroelectric Project in Glenn County
Castle Rock-Lakeville Line	Joint ownership, operated by PG&E	In Sonoma County

SVP's remote transmission assets are located in largely rural or open-space areas and are entirely above ground. Terrain and vegetation adjacent to these assets vary by location, but the transmission lines pass through mountainous areas—specifically, the entire length of the Grizzly Tie Line, the northwestern portion of the Black Butte Tie Line, and most of the Castle Rock–Lakeville Line, except for portions near Fulton, Lakeville, and Silverado. Vegetation adjacent to these assets is largely continuous and consists of a mixture of grasslands and forested areas. Mixed-conifer forest is the dominant vegetation along the Grizzly Tie Line; oak woodland is dominant adjacent to the Castle Rock–Lakeville Line; and annual grasslands with scattered tree cover are dominant adjacent to the Stony Gorge and Black Butte Tie Lines.

2.2 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. Based on the CPUC HFTD maps, the portion of SVP's service territory that contains the City of Santa Clara does not include any Tier 2 or Tier 3 HFTD acreage, and the nearest HFTD is more than 5 miles south in the Santa Cruz Mountains (CPUC n.d.). As described above, SVP's remote transmission assets pass through terrain and vegetation that can sustain wildfire spread, and two of these assets—the Grizzly Tie Line and the Castle Rock–Lakeville Line—are located within an HFTD. The Grizzly Tie Line is located entirely within a Tier 3 HFTD. The Castle Rock–Lakeville Line is located largely within a Tier 3 HFTD but includes a short section near its southern end in a Tier 2 HFTD. Small portions of the line are outside an HFTD near the communities of Lakeville,

Fulton, and Silverado. The Stony Gorge Tie Line is located along the edge of a Tier 2 HFTD adjacent to County Road 306. The Black Butte Tie Line is not located within a Tier 2 or Tier 3 HFTD.

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 POUs. 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 2 is a regulatory crosswalk of each PUC 8387(b)(2) required element and its location in the 2026-2028 SVP WMP.

Table 2. PUC 8387(b)(2) Crosswalk Table

PUC 8387 subsection	PUC 8387 subsection summary	Location within the WMP	Dudek Comments
§8387(a)	Utility shall construct, maintain, and operate its electrical lines and equipment in a manner that minimizes wildfire risk.	Section IV.A Policy Statement, pp. 7-8; Sections VIII.A-F Wildfire Preventative Strategies, pp. 13-18.	Meets Requirements
§8387(b)(2)(A)	Identify the persons responsible for executing the WMP and their responsibilities.	Section VI Roles and Responsibilities, pp. 10-12.	Meets Requirements
§8387(b)(2)(B)	Describe the objectives of the wildfire mitigation plan.	Section V Objectives of the Wildfire Mitigation Plan, pp. 9-10.	Meets Requirements
§8387(b)(2)(C)	Describe wildfire prevention strategies and programs, including consideration of climate change and changing weather conditions.	Section VII.A Particular Risks and Risk Drivers Associated with Topographic and Climatological Risk Factors, pp. 12-13; Section VIII Wildfire Preventative Strategies, pp. 13-18.	Meets Requirements
§8387(b)(2)(D)	Describe metrics used to evaluate WMP implementation and performance, including underlying assumptions.	Section XII Metrics and Assumptions for Measuring Plan Performance, pp. 19-20.	Meets Requirements
§8387(b)(2)(E)	Explain how previous performance metrics	Section XII.A Impact of Metrics on Plan, p. 20;	Meets Requirements. WMP does explain how metrics

PUC 8387 subsection	PUC 8387 subsection summary	Location within the WMP	Dudek Comments
	informed updates to the current WMP.	Appendix C Summary of Prior Year Performance, pp. 27-28.	inform current WMP. However, the value of the selected metrics is not clear since there are no reported incidents in either metric.
§8387(b)(2)(F)	Provide protocols for disabling reclosers and de-energizing/isolating facilities while considering public safety impacts and critical infrastructure.	Section IX Reclosing Policy, p. 18; Section X Isolation, p. 18; Section VI.C Wildfire Response and Recovery, pp. 11-12.	Meets Requirements. SVP does not have reclosers and has two approaches regarding de-energization/isolation.
§8387(b)(2)(G)	Establish procedures to notify customers, public safety agencies, first responders, healthcare facilities, and telecommunications providers before de-energization events.	Section X Isolation, p. 18; Section XI Community Outreach and Public Awareness, p. 18. WMP states no customers are served by the remote tie lines that may be isolated.	Meets Requirements. Customer notification procedures under subsection (G) are addressed by explaining that customer de-energization is not applicable.
§8387(b)(2)(H)	Provide plans for vegetation management.	Section VIII.D Vegetation Management, pp. 15-17.	Meets Requirements
§8387(b)(2)(I)	Provide plans for inspection of electrical infrastructure.	Section VIII.E Inspections, pp. 17-18.	Meets Requirements
§8387(b)(2)(J)(i)	Identify and prioritize wildfire risks and risk drivers associated with utility design, construction, operation, and maintenance.	Section VII Wildfire Risks and Drivers Associated with Design, Construction, Operation, and Maintenance, pp. 12-13.	Meets Requirements. Section VII does a good job of describing wildfire risks to each remote transmission asset.
§8387(b)(2)(J)(ii)	Identify wildfire risks and drivers associated with topographic and climatological conditions throughout the service territory.	Section VII.A Particular Risks and Risk Drivers Associated with Topographic and Climatological Risk Factors, pp. 12-13.	Meets Requirements. Section VII does a good job of describing wildfire risks to each remote transmission asset.
§8387(b)(2)(K)	Identify areas with wildfire threats greater than those shown on CPUC fire threat maps and recommend map revisions if appropriate.	Section VII.C Changes to CPUC Fire Threat Map, p. 13.	Meets Requirements
§8387(b)(2)(L)	Provide a methodology for identifying and presenting enterprise-wide safety and wildfire risks.	Section VII.B Identifying and Presenting Enterprise Wide Safety Risk, p. 13	Meets Requirements
§8387(b)(2)(M)	Describe the utility's process for restoring service following a wildfire.	Section VI.C Wildfire Response and Recovery, pp. 11-12; Section IX Reclosing Policy, p. 18.	Meets Requirements

PUC 8387 subsection	PUC 8387 subsection summary	Location within the WMP	Dudek Comments
§8387(b)(2)(N)(i)	Describe procedures to monitor and audit implementation of the WMP.	Section XIII Monitoring and Auditing the Plan, p. 20	Meets Requirements
§8387(b)(2)(N)(ii)	Describe procedures to identify and correct deficiencies in the WMP and its implementation.	Section XIII.A Identifying and Correcting Deficiencies in the Plan, p. 20.	Meets Requirements
§8387(b)(2)(N)(iii)	Describe procedures to monitor and audit the effectiveness of infrastructure inspections, including contractor inspections.	Section XIII.B Monitoring the Effectiveness of Inspections, p. 20; Section VIII.E Inspections, pp. 17-18.	Meets Requirements
§8387(b)(3)	Present the WMP at a public meeting, accept public comment, and verify compliance with applicable requirements.	Section XI Community Outreach and Public Awareness, p. 18; Section IV.B Purpose of the Wildfire Mitigation Plan, pp. 7-8	Pending.
§8387(c)	Obtain review by a qualified independent evaluator and publish/present the evaluation report.	Section XIV Independent Auditor, p. 20.	Pending.

Overall Compliance Assessment: The draft WMP generally addresses each element listed in PUC Section 8387(b)(2)(A)–(N) and the independent evaluator requirements of PUC Section 8387(c). The primary area that may warrant additional discussion is PUC Sections 8387(b)(2)(F) and 8387(b)(2)(G), where the WMP discusses the utility’s de-energization protocol and notes that customer notification procedures are not applicable because the facilities subject to isolation are generation and transmission tie lines with no affected retail customers. The WSAB is emphasizing a more robust approach to POU de-energization protocols, and the WMP may benefit from expanding this section into two parts. The first would explicitly state that proactive de-energization is not a mitigation strategy the utility will use in Santa Clara. The second would retain the existing text in Section X of the WMP regarding remote transmission assets.

4 Wildfire Risk Driver to Mitigation Strategy Comparison

As noted in the WMP, SVP’s wildfire risk exposure differs significantly between its urban service territory and its remote transmission assets. Its service territory, located in a highly urbanized area of the southern San Francisco Bay, has a low risk of wildfire ignition from SVP equipment or other sources. In contrast, its remote assets are located in sparsely developed or agricultural areas where the combination of terrain and fuels increases wildfire risk. SVP does not use entirely different wildfire mitigation strategies for its service territory and remote assets. Rather, SVP modifies its mitigation practices to reflect the different conditions in each area. Table 3 compares the wildfire risk drivers identified in the WMP with one or more SVP wildfire mitigation strategies that address each risk driver.

Table 3 Wildfire Risk Driver to Mitigation Strategy Comparison

Wildfire Mitigation Strategy	Wildfire Risk Driver	Comment
Situational Awareness		
Daily weather monitoring	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, High wind events, Lightning, Dry fuels	
ONCC Significant Fire Potential monitoring	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, High wind events, Lightning, Dry fuels	Used with remote transmission assets only.
NWS fire weather products	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, High wind events, Lightning, Dry fuels	Used with remote transmission assets only.
PG&E wildfire information	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments	Used with remote transmission assets only.
Red Flag Warning monitoring	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, Drought, Changing climate conditions, High wind events, Lightning, Dry fuels	Used with remote transmission assets only.
Vegetation Management		
Annual vegetation inventory	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, Vegetation contact, Forest vegetation	SVP completes annual asset inspections on all SVP lines in the service territory and at remote assets.
Annual trimming program	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, Vegetation contact, Forest vegetation	Minimal tree cover near lines along remote transmission assets.
Annual vegetation clearance inspections	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, Vegetation contact, Forest vegetation	SVP completes annual asset inspections on all SVP lines in the service territory and at remote assets.
Inspections		
Annual line inspections	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, Electrical faults, Wildlife contact,	SVP completes annual asset inspections on all SVP lines in the service territory and at remote assets.

Wildfire Mitigation Strategy	Wildfire Risk Driver	Comment
	Vegetation contact, Aging hardware, Limited real-time field presence	
Drone inspections	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, Electrical faults, Wildlife contact, Vegetation contact, Aging hardware, Limited real-time field presence	
Helicopter inspections	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, Electrical faults, Wildlife contact, Vegetation contact, Aging hardware, Limited real-time field presence	
Thermal imaging	Energized facilities in wildfire-prone environments, Electrical faults, Wildlife contact, Vegetation contact, Aging hardware,	
Corona imaging	Energized facilities in wildfire-prone environments, Electrical faults, Wildlife contact, Vegetation contact, Aging hardware,	
Additional Red Flag Warning patrols	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, Limited real-time field presence, High wind events, Lightning, Dry fuels	Used with remote transmission assets only.
Design and Construction		
Raptor protection measures	Wildlife contact	SVP completed installation in 2020.
Hardware inspections	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, Electrical faults, Wildlife contact, Vegetation contact, Aging hardware	.
Thermal inspections	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, Electrical faults, Aging hardware	
Operational Procedures		
Isolation protocols	High wind events, Lightning, Dry fuels, Mountainous terrain Forest vegetation, Remote overhead transmission facilities, Energized	Used with remote transmission assets only.

Wildfire Mitigation Strategy	Wildfire Risk Driver	Comment
	facilities in wildfire-prone environments, Electrical faults	
Wildfire patrols	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments, Vegetation contact, Aging hardware, Limited real-time field presence	Used with remote transmission assets only.
Event logging	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments	
Training programs	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments	
Workforce Preparedness		
Annual wildfire training	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments	
Pre-season briefings	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments	
Defined response roles	Remote overhead transmission facilities, Energized facilities in wildfire-prone environments	

The wildfire mitigation strategies implemented by SVP and summarized in Table 3 are generally consistent with programs implemented by similarly situated publicly owned utilities that have core service territories in heavily urbanized areas and operate limited facilities in elevated wildfire-threat areas. For comparison, the neighboring City of Palo Alto Utilities primarily relies on asset inspection and vegetation management to address wildfire risk in portions of its service territory that are within elevated wildfire-threat areas (City of Palo Alto Utilities 2025). The wildfire mitigation strategies in SVP's WMP generally correspond to the identified risk drivers. No significant wildfire risk driver was identified that lacks at least one associated mitigation measure. However, some climate-driven risk considerations could be further quantified through formal fire-risk analytics, particularly because the WMP describes five risk categories in the Weather Monitoring section (Section VII.B).

5 Conclusion and Recommendations

5.1 Recommendations

WMP metrics inform the utility about the effectiveness of its wildfire mitigation strategies and help readers understand how those strategies affect wildfire risk drivers. SVP's current metrics—fire ignitions and downed wires—are event- or outcome-based and reflect worst-case results of wildfire mitigation efforts: a fire or an outage caused by a condition likely to ignite a fire. However, these metrics track only worst-case events and therefore provide a limited view of the risk that SVP equipment could ignite a fire. Ideally, SVP would utilize a metric that identifies wildfire risks and risk drivers before a worst-case event occurs to complement the two existing event based metrics. However, based on Dudek's review of SVP's practices such a metric would not have any practical value and thus would not help SVP monitor their implementation of their WMP wildfire mitigation strategies. The decision to isolate these lines is not based on the issuance of red flag warning by the NWS. As shown in Appendix C of the WMP, SVP isolates Stony Gorge and Black Butte lines at the start of the fire season (May) and does not re-energize them until fire season ends (November).

5.2 Conclusion

The Independent Evaluator finds that the 2026 Wildfire Mitigation Plan developed by SVP provides a technically sound and generally comprehensive framework for wildfire risk management. The WMP clearly identifies the utility's limited wildfire risk within its urban service territory and appropriately focuses mitigation efforts on remote transmission and generation tie-line facilities located in elevated wildfire threat environments.

The WMP addresses the principal wildfire risk drivers affecting those assets through layered mitigation strategies that include weather monitoring, vegetation management, inspections, workforce training, operational controls, and line isolation procedures. The identified mitigation measures are generally aligned with industry practices and are proportional to the scale and complexity of SVP's wildfire exposure.

The evaluator concludes that the WMP substantially complies with the requirements of California Public Utilities Code Section 8387 and reflects a mature understanding of the wildfire risks associated with SVP-owned facilities.

6 References

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