



2027-2028

Wildfire Mitigation Plan



SEPTEMBER 2026

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1.0 Executive Summary

1.1 Introduction

Wildfires, longstanding threats to parts of California, have been increasing in intensity and frequency due to climate change, human activity, and development of wildlands. As a result, exposure at the wildland-urban interface has grown significantly. The continuing threat posed by wildfires to public safety resulted in a major change in the State of California's fire prevention approach, including the requirement that electrical utilities prepare a year-round wildfire mitigation plan.

This document presents the Wildfire Mitigation Plan (WMP or Plan) prepared by the Los Angeles Department of Water and Power (LADWP or Department) in response to this statutory requirement.

1.2 Policy Statement

LADWP is a municipal utility serving the City of Los Angeles (City) and the Owens Valley, California. It exists under and by virtue of the Charter of the City of Los Angeles. LADWP is a vertically integrated utility that owns and operates the majority of its generation, transmission, and distribution systems.

LADWP exists to support the growth and vitality of the City, its residents, businesses and diverse communities it serves. Guided by a core focus on Customers, Communities, and Co-Workers, LADWP is committed to delivering water and power in a safe, reliable, cost-effective, affordable, equitable, and environmentally responsible manner.

The scope of this WMP encompasses LADWP infrastructure that operates within the State of California.

1.3 The Wildfire Mitigation Plan (WMP)

In response to the growing threat of wildfires, LADWP issued its first WMP in December 2019.

1.3.1 WMP Statutory Requirements

The initial WMP and all subsequent updates are consistent with State of California's Senate Bill 901 (SB 901) (2018), Assembly Bill 1054 (AB 1054) (2019), and Senate Bill 254 (SB 254) (2025), and comply with California Public Utilities Code Section 8387(b)(1), which requires publicly owned electric utilities to prepare a wildfire mitigation plan at least once every four years on a schedule determined by the California Wildfire Safety Advisory Board (WSAB). WSAB's current WMP submittal schedule requires LADWP, as one of the 28 publicly owned utilities (POU) and electrical cooperatives in California with overhead facilities located in Tier 2 or 3 High Fire-Threat Districts, to update and submit its WMP for review once every two years. Furthermore, LADWP's next required WMP submittal is on or before October 6, 2028. This WMP applies

exclusively to LADWP's electric system infrastructure, facilities, and operations located within the state of California, in accordance with Public Utilities Code § 8387.

1.3.2 2027-2028 Strategic Objectives

Each year, LADWP reviews the WMP to strengthen its approach to reducing wildfire risk from electrical infrastructure. Recent WMP cycles have expanded this effort by incorporating critical information on wildfire-related mitigation activities for both the Water and Power Systems. The July 2025 WMP publication marked a key point in this progression, integrating the most relevant information available at the time.

The unprecedented Los Angeles fires of January 2025 confronted the Department's customers, the communities it serves, and its workforce with extraordinary conditions, demanding immediate action in emergency response and long-term recovery. The fire's toll—6,837 homes and businesses lost, 973 additional structures damaged, twelve lives tragically taken, and numerous civilians and firefighters injured—underscored the scale of the challenge. The January 2025 fires reinforced the importance of LADWP prioritizing strengthening infrastructure resilience and continuously evaluating ways to improve operations.

The Department remains focused on **preventing catastrophic losses**. The 2025 fires demonstrated how quickly a confluence of extreme weather, environmental conditions, and extraordinary water demands can exceed the distribution capacity of even well-established infrastructure.

These events reinforced the importance of an effective Wildfire Safety Risk Governance framework that unifies strategic decision-making and strengthens cross-departmental accountability; ongoing risk identification that captures emerging hazards, system vulnerabilities, and interdependent threats; and robust risk mitigation informed by deep coordination with public safety agencies, local jurisdictions, and customers, supported by sustained investment in resilient infrastructure.

This WMP builds on that understanding by sharpening the Department's risk-reduction framework and strengthening the measures that protect customers, communities, and co-workers. Each element of the updated Plan is designed not only to address identified vulnerabilities but to anticipate emerging threats—helping LADWP to withstand, respond to, and potentially prevent large-scale wildfire impacts in the years ahead.

LADWP's Risk and Compliance Office, Power System Executive Office, Water System Executive Office, Office of Climate Resiliency and Emergency Management, and various collaborators worked together closely on this WMP update. Each of these LADWP Offices is responsible for the development, implementation, and oversight of its respective 2027–2028 WMP commitments. This WMP is subject to review by the LADWP Board of Water and Power Commissioners (Board).

1.3.3 WSAB Guidance

During 2025-2026, prior to preparing and throughout the preparation of this WMP, WSAB's close engagement with the California Municipal Utilities Association (CMUA), including LADWP, yielded a set of seasonal focus areas desired to be highlighted in the imminent POU WMPs. The topics included 1) considerations for proactive de-energization, 2) risk modeling, and 3) continuous improvement.

Considerations for Proactive De-Energization

LADWP continues to actively study proactive de-energization¹ practices through workshops, industry benchmarking, and participation in statewide utility exercises, while evaluating how such a protocol could align with the unique characteristics of its system. Based on factors analyzed to date, LADWP's current assessment is that proactive de-energization presents both potential wildfire-risk-reduction benefits and important safety and reliability considerations for its diverse service territory. LADWP is continuing to refine its data needs, modeling capabilities, and infrastructure priorities, and is incorporating stakeholder input as part of this ongoing evaluation. The Department will also continue monitoring other utilities' experiences with proactive de-energization to inform future decision-making. LADWP anticipates providing additional updates in its next WMP. Please see Section 7.2.6.3 of this report for more information.

Risk Modeling

LADWP is expanding its Enterprise Risk Management organization and continuing to improve its quantitative wildfire risk modeling capabilities, while relying in the near term on established reliability programs and new technology investments. To guide mitigation choices, it is evaluating both short-term benefit-cost ratios and long-term total cost of ownership, along with feasibility, constructability, and reasonableness of construction timelines. By 2028 and beyond, LADWP aims to fully deploy advanced modeling tools supported by a unified wildfire risk data system integrating asset, vegetation, meteorology, and geographic information. Please see section 5.3 of this report for more information.

Continuous Improvement

LADWP tracks a comprehensive set of metrics across risk assessment, risk reduction activities, and outcomes to evaluate wildfire mitigation performance and guide continuous improvement of its WMP. These metrics help identify outage trends, assess reliability, monitor inspection and asset-replacement progress, and inform updates to mitigation strategies. As LADWP gathers more data over time, LADWP will increasingly use these metrics to refine its programs, ensure regulatory compliance, and enhance grid safety and reliability.

WSAB further shared the desire to highlight emergency management practices in future WMPs. LADWP has made various improvements in this area and has put in motion

¹ In the context of wildfire ignition prevention, this is often referred to by other utilities as Public Safety Power Shutoff (PSPS)

several substantial operational enhancements, further described in section 8.0 of this report.

1.4 Results and Accomplishments To-Date

Supplying water to Los Angeles since 1902, and electricity since 1917, LADWP has evolved to meet customer needs and to provide reliable water and power service in a safe, cost-effective, and environmentally responsible manner. Contributing to LADWP’s long history of dedication to its customers and the communities it serves, LADWP continually evaluates, develops, maintains and improves its wildfire mitigation strategies and programs.

Over the years, LADWP has developed and implemented a diverse range of strategies and programs to mitigate wildfires. These activities have included initiatives to harden systems and improve capabilities in asset inspections, vegetation management, risk management, situational awareness and community outreach. Noteworthy achievements that support LADWP’s wildfire mitigation efforts are shown below in Table 1-1, “Results and Accomplishments.”

Table 1-1: Results and Accomplishments

Category	Results and Accomplishments
Governance and Strategic Direction for LADWP Wildfire Mitigation	- LADWP's Chief Risk and Compliance Officer maintains strategic oversight for Enterprise Risk, including ownership of Wildfire Risk and the associated Wildfire Safety Risk Governance frameworks - Under the direction of LADWP's Chief Risk and Compliance Officer, the Executive Director of Enterprise Risk and Wildfire Risk Governance facilitates the Wildfire Safety Risk Governance framework, including: - Wildfire Safety Executive Council, - Wildfire Safety Director Steering Committee, - Wildfire Safety Sub-Committees, and - Wildfire Safety Tactical Teams - Wildfire Safety Executive Council serves as the top decision-making body within the wildfire safety risk governance structure and is comprised of the Interim General Manager and direct reports - Wildfire Safety Director Steering Committee translates the Executive Council's strategic direction into actionable initiatives - Eight (8) Wildfire Safety Subcommittees leading efforts in: - System Hardening & Grid Resiliency - Field Operations - Technology & Innovation - Stakeholder & Community Engagement - Risk Modeling - Performance Tracking - Emergency Operations - Policy & Regulation - Ad hoc Tactical Team assessing the feasibility and applicability of proactive de-energization protocols
Asset Maintenance in High Fire Threat Districts (HFTDs)	- Replaced the following quantities of assets in HFTDs between fiscal years 2018-2024 as part of the Power System Reliability Program (PSRP): 5,478 Poles 10,886 Crossarms 2,277 Transformers 25.58 Miles of Conductor - Significantly increased transformer and conductor mileage replacement rates within the latter half of the 2018-2024 fiscal year range, with the following noteworthy points:

Category	Results and Accomplishments
	- More than half of PSRP transformer replacements in HFTDs between fiscal years 2018-2024 occurred solely within FY 2023-2024. - The conductor mileage replacement rate in HFTDs increased from an average of 0.55 miles in the first half of the reporting period to an average of nearly 8 miles in the second half. - Recognized relatively consistent replacement rates of poles and crossarms within HFTDs for each fiscal year during the 2018-2024 fiscal year range.
Power Engineering	- Continued progress at various switching stations for construction of Fire Protection Systems which includes a perimeter of fire hydrants, a fire protection water tank, and fire pumps. Following the Palisades Fire in Jan 2025, Power System Construction rebuilt the electric distribution system to its original configuration and hardened seven (7) miles of 4.8 kV distribution lines with steel poles. For the Long-Term Rebuild and Recovery Plan², Power System engineers developed plans and designs to underground and upgrade 45 miles of overhead distribution lines to increase reliability and resiliency to future climate-driven events. Plans and ongoing work include: - Building a six-mile 35 kV/12 kV electric distribution backbone on Sunset Boulevard - Expanding DS-29 to 60 MW capacity - Undergrounding 45 miles of residential circuits - Upgrading 45 miles of 4.8 kV distribution lines to 12 kV to increase system capacity and enable planned/future electrification
Risk Management	- Established an Enterprise Risk Management (ERM) Program and appointed an inaugural Executive Director of Enterprise Risk. - Utilized a third-party with extensive risk management experience to assess the current state and opportunities for improvement of LADWP's ERM Program.
Vegetation Management	- Performed line clearance tree trimming on approximately 215,000 trees per year. - Patrolled the clearances between conductors and vegetation of 100% of transmission and distribution lines at least once per calendar year. - Completed 100% of routine inspections for Power System vegetation management.

² For more information, visit <https://www.ladwp.com/community/restoration-and-rebuilding-efforts>

Category	Results and Accomplishments
Technology and Innovation	• LADWP continues to expand wildfire situational awareness capabilities within HFTD areas through deployment of advanced cameras and weather stations • To date, LADWP has installed: ○ 186 cameras; and ○ 140 weather stations. • LADWP projects installation of an additional: ○ 1,580 cameras between 2025 and 2027. • These investments support early wildfire detection, real-time situational awareness, operational response, grid resiliency, and public safety.
Water System	• Executed an MOU with Los Angeles Fire Department (LAFD) for LAFD contractors to conduct brush clearance of LADWP properties in the Los Angeles Basin. • Staffed up to 40 Operations Metro personnel dedicated to brush clearance of LADWP Water System properties in the Los Angeles Basin. • Met annual brush clearance requirements under the City's Brush Clearance Ordinance. • Completed brush clearance of the Bouquet Pipeline in the Angeles National Forest and removed several dead trees along the aqueduct and within reservoir facilities. • Installed slope erosion control measures, hydroseeded wildfire burn scars, and repaired fire-damaged equipment in or adjacent to water storage facilities in the Palisades area. • Developed and implemented the Palisades Water Quality Restoration Dashboard for real-time sharing of water quality results during emergency and recovery.

1.5 Forward-Looking Blueprint

To continue LADWP's long history of dedication to its customers and the communities served, a forward-looking blueprint has been developed for LADWP programs and strategies which help mitigate wildfires. The table below presents the initial plan for wildfire mitigation activities for 2027 through 2028.

Table 1-2: Forward-Looking Blueprint

Category	Plan for 2027-2028
Governance and Strategic Direction for LADWP Wildfire Mitigation	- Evaluate, pilot, and recommend emerging technologies that support wildfire detection, wildfire prediction, and system resiliency. - Promote inclusive and transparent engagement with customers, elected officials, neighborhood councils, and community leaders in wildfire-prone areas. - Strengthen operational awareness and readiness by incorporating real-time intelligence, benchmarking, and historical feedback. - Continue assessing the feasibility, benefits, and costs of wildfire-related proactive de-energization or alternatives with robust emergency communication planning. - Maintain robust Geographic Information System (GIS) infrastructure to overlay system assets, wildfire threat tiers, and environmental risk factors for planning and real-time response. - Align LADWP's wildfire strategies with updated local, state, and federal regulatory guidance and newly-enacted wildfire laws. - Facilitate collaboration between Water, Power, and Joint systems to help ensure comprehensive wildfire mitigation planning, including this WMP. - Refine performance metrics and promote accountability through ongoing tracking of WMP milestones and deliverables. - Design and implement simulated wildfire and emergency events to test internal readiness and validate existing response protocols. - Identify, prioritize, and coordinate infrastructure upgrades that physically strengthen the electrical power system against wildfire risks, extreme weather, and other environmental stressors.
Metrics and Monitoring	- Continue updating WMP metrics and monitoring activities, as new information becomes available. - Identify new metrics and monitoring activities, where applicable, to help strengthen LADWP's wildfire mitigation programs and strategies.

Category	Plan for 2027-2028
Power Engineering	Continue construction for Fire Protection Systems at key switching stations.
Quality Management	- Develop an enterprise Quality Management System (QMS) that provides structure, discipline, and accountability to LADWP's quality practices. - Provide enterprise direction and guidance for the advancement of quality assurance, quality control, and quality auditing functions. - Continue developing processes, procedures, qualification requirements, and documentation standards for quality control activities in both vegetation management and inspection and maintenance.
Risk Management	- Develop a strategic plan for the ERM Program that: - Considers the draft recommendations from the ERM Program risk assessment, - Establishes a formalized ERM Program, - Includes measures for continuous improvement of LADWP's ERM Program. - Incorporate appropriate measures and lessons learned from ERM Program development into wildfire risk mitigation activities and the corresponding WMP sections.
Water System	- Continue to meet annual brush clearance requirements under the City's Brush Clearance Ordinance. - Implemented an ArcGIS-based dashboard application for LAFD to record fire hydrant inspection results and make them available to LADWP crews in real time. - Update MOU with LAFD for fire hydrant inspection services. - Continue to provide fire departments with access to water for aerial firefighting at (4) non-potable reservoirs in the Metro area (Hollywood, Encino, Lower Stone, Silver Lake) and (2) outside the LA Basin (Bouquet, Fairmont). - Continue to provide LAFD with access to cisterns and Heli-Hydrants

2.0 WMP Overview

2.1 WMP Objectives

The objectives of LADWP's WMP address public safety, grid resiliency, cost effectiveness, and continual improvement.

- Promote Public Safety by Reducing Sources of Ignition

The primary WMP goal is to help reduce the risk that LADWP's transmission and distribution system might become the source of ignition for a wildfire. Over the years, LADWP has evaluated prudent and cost-effective improvements to its physical assets, operations, and training that can help to meet this objective, and LADWP implements those improvements consistently with those evaluations.

- Improve Resiliency of the Grid

The second WMP goal is to improve the resiliency of the electric grid. As part of WMP-related activities, LADWP assesses new industry practices and technologies that may reduce the likelihood of an interruption in service and improve the restoration of service without increasing wildfire risk.

- Enhance Efficiency and Improve Programs and Protocols

The third and final WMP goal is to measure the effectiveness of specific wildfire mitigation strategies.

2.2 Contents of the 2027-2028 WMP

This 2027-2028 WMP includes the following information:

- WMP Overview, including traceability to requirements and other pertinent information
- WMP Objectives
- LADWP Organization and Responsible Persons
- Overview of LADWP Service Territory, including High Fire Threat Districts
- LADWP Wildfire Risk Management Program
- Wildfire Risk Control and Mitigation Programs
- Wildfire Emergency Operations
- Wildfire Recovery, Community Outreach, Public Awareness
- Metrics for measuring WMP results, monitoring, determining lessons learned, identifying areas for improvement, and evaluating WMP effectiveness

2.3 Cross-Reference to 2025 WMP Issued July 2025

See Appendix A.

2.4 Cross-Reference to Statutory Requirements

LADWP provides the following table below per the recommendation of the Wildfire Safety Advisory Board to assist its staff and Board members in their review of LADWP's 2027-2028 WMP to help ensure statutory requirements are met.

Table 2-1: Cross Reference to Statutory Requirements

Requirement	Statutory Language	Location in 2027-2028 WMP
Persons Responsible	PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.	Section 3.0
Objectives of the Plan	PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section 2.1
Preventive Strategies	PUC § 8387(b)(2)(C): A description of the preventive strategies and programs to be adopted by the local publicly owned electric utility or electrical cooperative to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.	Sections 6.0 and 7.0 and all subsections
Evaluation Metrics	PUC § 8387(b)(2)(D): A description of the metrics the local publicly owned electric utility or electrical cooperative plans to use to measure and track the implementation of the plan and the assumptions that underlie the use of those metrics.	Sections 10.0 and 10.1
Impact of Metrics	PUC § 8387(b)(2)(E): A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	Sections 6.0, 7.0, 10.0 and all subsections; and Appendix D
De-energization Protocols	PUC § 8387(b)(2)(F): Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, and protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	Sections 7.2.5 and 7.2.6

Requirement	Statutory Language	Location in 2027-2028 WMP
Customer Notification Procedures	PUC § 8387(b)(2)(G): Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential de-energization for a given event.	Sections 7.2.6.1, 7.3 and all subsections
Vegetation Management	PUC § 8387(b)(2)(H): Plans for vegetation management.	Sections 6.4, 6.5 and all subsections
Inspections	PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section 6.1 and all subsections
Prioritization of Wildfire Risks	PUC § 8387(b)(2)(J): A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility's or electrical cooperative's service territory. The list shall include, but not be limited to, both of the following: (i) Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's or electrical cooperative's equipment and facilities. (ii) Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility's or electrical cooperative's service territory.	Section 5.0 and all subsections; and Appendix B
California Public Utilities Commission (CPUC) Fire Threat Map Adjustments	PUC § 8387(b)(2)(K): Identification of any geographic area in the local publicly owned electric utility's or electrical cooperative's service territory that is a higher wildfire threat than is identified in a commission fire threat map, and identification of where the commission should expand a high fire-threat district based on new information or changes to the environment.	Sections 4.2 and all subsections, 5.2.3, and 5.3.1; and Appendix B

Requirement	Statutory Language	Location in 2027-2028 WMP
Enterprise-wide Risks	PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk.	Section 5.4
Restoration of Service	PUC § 8387(b)(2)(M): A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	Section 8.11
Monitor and Audit	PUC § 8387(b)(2)(N): A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following: (i) Monitor and audit the implementation of the wildfire mitigation plan. (ii) Identify any deficiencies in the wildfire mitigation plan or its implementation and correct those deficiencies. (iii) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, other applicable statutes, or commission rules.	Sections 6.1.3, 6.1.4, 6.3.3, and 10.3 through 10.5
Public Meeting	PUC § 8387(b)(3): In each year it is required to submit a plan, the local publicly owned electric utility or electrical cooperative shall present its wildfire mitigation plan in an appropriately noticed public meeting. The local publicly owned electric utility or electrical cooperative shall accept comments on its wildfire mitigation plan from the public, other local and state agencies, and interested parties, and shall verify that the wildfire mitigation plan complies with all applicable rules, regulations, and standards, as appropriate.	This requirement is fulfilled at a public LADWP Board of Commissioners meeting to occur following this report's filing.

Requirement	Statutory Language	Location in 2027-2028 WMP
Qualified Independent Evaluator	PUC § 8387(c): The local publicly owned electric utility or electrical cooperative shall contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The independent evaluator shall issue a report that shall be made available on the Internet website of the local publicly owned electric utility or electrical cooperative, and shall present the report at a public meeting of the local publicly owned electric utility's or electrical cooperative's governing board.	Section 10.4

2.5 Cross Reference to Wildfire Safety Advisory Board (WSAB) Recommendations

Historically, LADWP management and subject matter experts reviewed both specific and generic WSAB recommendations and incorporated this guidance as applicable to LADWP's position as a "local publicly owned electric utility" under PUC § 8387.

In December 2024, the WSAB issued recommendations in its *Advisory Opinion For The 2025 Wildfire Mitigation Plans Of Publicly Owned Electric Utilities And Electrical Cooperatives*. Today, LADWP's decision to align with WSAB guidance (to the extent feasible) is reinforced by LADWP senior leadership, as is evidenced in the start-up activities initiated by the newly formed Performance Tracking & Evaluation Subcommittee under LADWP's Wildfire Safety Council & Committees.

In particular, and as presented in Section 2.5.5, "Wildfire Safety Council and Committees," an important part of the Core Focus for the Performance Tracking & Evaluation Subcommittee includes the following position on the topic of Key Performance Indicators (KPIs):

"KPI development aligned with the Wildfire Safety Advisory Board".

Since the work of the eight subcommittees to the newly formed Wildfire Safety Risk Governance framework began in late second quarter of 2025, some of the WSAB-recommended efforts are still under evaluation or in progress. LADWP provides the following table below to assist the WSAB staff, Board members, and other WMP stakeholders in their review of the status of these efforts, as documented in the 2027-2028 WMP.

Table 2-2: Cross Reference to WSAB Recommendations

WSAB Recommendation Number	WSAB Recommendation	Section(s) in 2027-2028 WMP
1	Summary of Projects and Programs	1.4, 1.5, 3.5.5 & 5.0 through 12.0
2	Late WMP Submissions	Not Applicable
3	Tracking Changes to WMPs	11.0
4	Digital Accessibility	Not Applicable
5	Areas that Exceed Minimum Standards in General Orders	6.1, 6.4, 6.5 & 7.1
6	Independent Evaluator Reports	Not Applicable ³
7	Alternative Reporting for POUs Without Overhead Electric Supply Facilities in HFTDs	Not Applicable
8	Progress and Achievements	1.4, 6.0, 7.0, 10.0 & Appendix C
9	Quality Assurance/Quality Control Programs	3.5.3, 6.1 & 6.4
10	Performance Metrics	10.1, 10.1.4
11	Other Topics	Not Applicable

2.6 Los Angeles County Blue Ribbon Commission Recommendations

The [Los Angeles County Blue Ribbon Commission \(BRC\) on Climate Action and Fire Recovery](#) issued their Final Report in June 2025 for the resilient and sustainable rebuilding of Los Angeles County.

The BRC's report contains recommendations organized into ten areas:

- Immediate recovery needs
- Building codes and resilience standards
- Vegetation, urban landscapes and wildlands
- Insurance reforms for resilient communities
- Land use and workforce

³ The Independent Evaluator report will be posted on LADWP's website and its results presented to the Board of Commissioners. See Section 10.4 for more information.

- Energy system resilience and modernization
- Water system resilience and safety
- Community resilience, equity and health
- Finance
- Governance and accountability

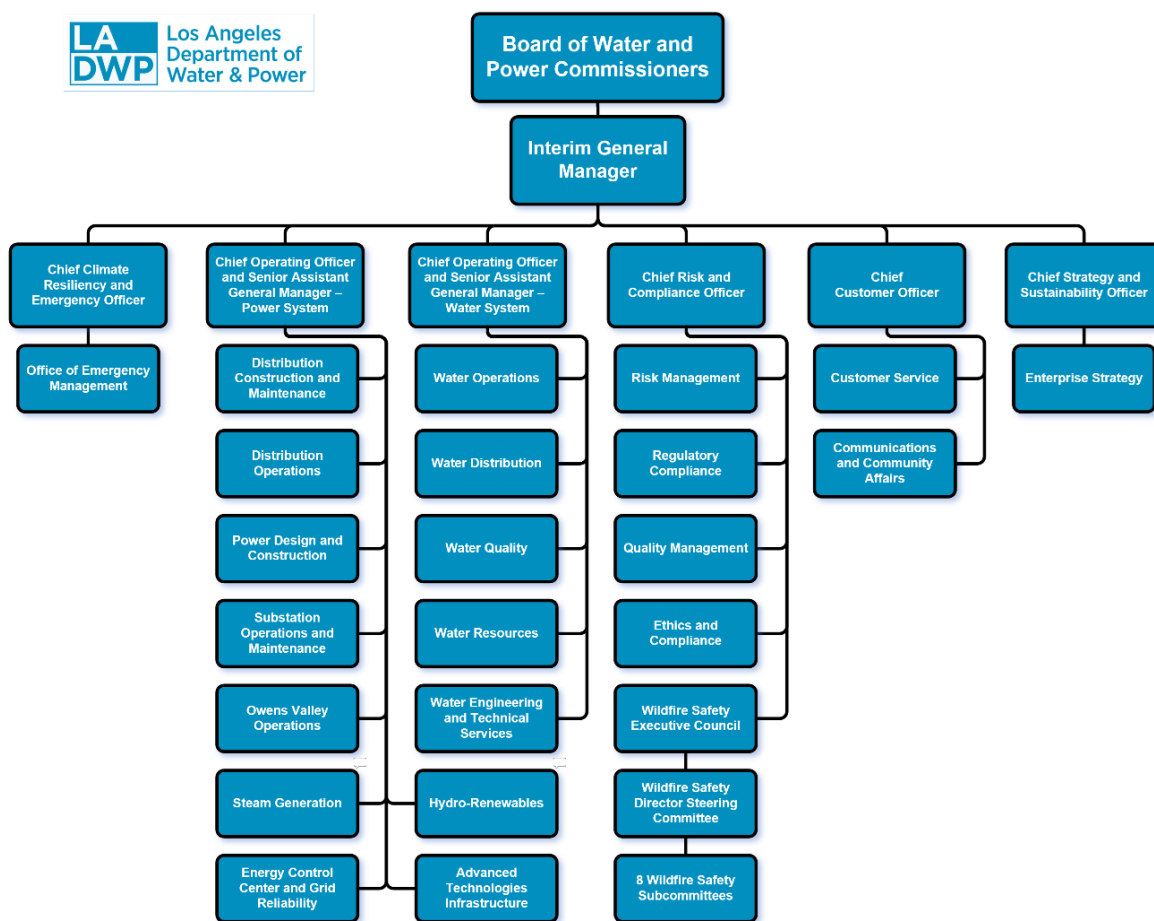
LADWP provided input to the BRC's Water Working Group during the development of their findings. One of LADWP's recommendations, which was integrated into the BRC's water system resilience findings, was regarding the replacement of pipe material on the customer side of the meter before rebuilding a residence.

LADWP is currently reviewing the BRC's other findings to evaluate applicability, feasibility, and next steps for implementation.

3.0 LADWP Organization and Responsible Persons

This section presents the LADWP organizational structure and describes the LADWP positions responsible for WMP implementation, updates, monitoring, and other activities necessary to achieve WMP objectives and goals. *Note: This organizational chart is non-exhaustive.*

Figure 3-1: LADWP Organizational Chart



3.1 Board of Water and Power Commissioners

The Board of Water and Power Commissioners is granted the possession, management and control of the LADWP. The Board has the power and duty to make and enforce all necessary rules and regulations governing the construction, maintenance, operation, connection to and use of the LADWP, and to acquire, construct, extend, maintain and operate all improvements, utilities, structures and facilities the Board deems necessary or convenient for purposes of the Department. The Mayor of the City appoints the members of the Board, subject to City Council confirmation. The members of the Board serve with only nominal compensation. Certain matters regarding the administration of the Department also require the approval of the City Council.

3.2 Interim General Manager

The management and operation of the Department are administered under the direction of the Interim General Manager (formerly the Chief Executive Officer and Chief Engineer). The Interim General Manager oversees various executive positions including Chief Operating Officer and Senior Assistant General Manager – Water, Interim Chief Operating Officer and Senior Assistant General Manager – Power, the Chief Risk and Compliance Officer, the Chief Climate Resiliency and Emergency Management Officer, and other Senior Assistant General Managers.

3.3 Power System Executive Office

Power System Executive Office is responsible for managing all aspects of the Power System and comprises four (4) roles: i) the Chief Operating Officer and Senior Assistant General Manager of Power System, ii) the Assistant General Manager of the Transmission and Distribution subsystem, iii) the Assistant General Manager of the Energy Delivery subsystem, and iv) Assistant General Manager of the Planning and Modernization subsystem. The three Assistant General Managers report to the Chief Operating Officer and Senior Assistant General Manager of Power System.

The Chief Operating Officer and Senior Assistant General Manager of LADWP's Power System oversees the entirety of the Power System and is responsible for overseeing the implementation of its respective WMP commitments. In addition to the three subsystems listed above, the Chief Operating Officer and Senior Assistant General Manager oversees various functions, including but not limited to:

- Power System Safety and Training Division
- Power Asset Management Office
- Project Management Office
- Executive Leadership Development Division
- Palisades Rebuild
- Strategic Initiatives and External Affairs

The Assistant General Manager of Transmission and Distribution oversees the Power System's critical design, construction, maintenance, and operations activities across the transmission and distribution systems, including:

- Power Design and Construction Division
- Distribution Operations Division
- Substation Operations and Maintenance Division
- Distribution Construction and Maintenance Division

The Assistant General Manager of Energy Delivery manages the Power System's marketing functions and the design, maintenance, and operations activities of its generation system, including:

- Owens Valley Operations Division
- Steam Generation Division

- Hydro-Renewables Division
- Energy Procurement and Market Operations Division
- Generation Engineering and Capital Delivery Division

The Assistant General Manager of Planning and Modernization manages the Power System's advanced technologies, meter services and field operations, energy control operations, planning and innovation, and new business function, including:

- Planning and Innovation Division
- Energy Control Center and Grid Reliability Division
- Advanced Technologies Infrastructure Division
- New Business and Electrification Division

3.3.1 Distribution Construction and Maintenance Division (DCM)

DCM is primarily responsible for the design, construction, inspection, and maintenance of LADWP's distribution lines. DCM groups adhere to the Operations and Protocols discussed in Section 7.2, "Operations and Protocols," below and are responsible for implementing electric facility design, inspection, maintenance, and vegetation management to reduce the risk of wildfires.

The role of DCM is to:

- Maintain the Power System to provide reliable electric service while reducing safety risks from LADWP's distribution facilities.
- Comply with relevant federal, state, and industry standard requirements, including the applicable industry standards established by the California Public Utilities Commission (CPUC).
- Provide regular training programs for DCM employees having obligations for WMP implementation.

DCM includes the Vegetation Management group, the Overhead Distribution Design group, the Codes and Ordinances group, the Inspection and Maintenance group, the Underground Service Alert group, the Contract Operations group, and six distribution operating districts.

- Vegetation Management

A key group within DCM is the Vegetation Management Group which prunes and removes vegetation that poses a risk of interfering with the Power System by maintaining required clearances between vegetation and Department conductors and facilities. It conducts multiple patrols on a 12-month cycle and on-the-spot inspections for other LADWP groups and ratepayers on an as-needed basis.

LADWP adheres to CPUC GO 95 Rule 35 which states: "When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that dead, rotten or diseased trees or dead, rotten or diseased portions of otherwise healthy trees overhang or

lean toward and may fall into a span of supply or communication lines, said trees or portions thereof should be removed.”

DCM also includes the Distribution Engineering Section, which adheres to LADWP’s construction standards when designing the infrastructure necessary to distribute power to its customers and communities in a safe and environmentally responsible manner. Design criteria and methods are consistent with industry standards that include, but are not limited to, CPUC’s General Orders (GO), American National Standards Institute (ANSI), and the Institute of Electrical and Electronics Engineers (IEEE). All designs meet these criteria to help ensure the reliability and safety of LADWP’s grid and service territory.

3.3.2 Distribution Operations Division (DO)

DO is responsible for the Power System’s operational response to hazards and emergencies impacting the distribution system. It includes the Electric Trouble Section and Streetlight Maintenance group and is being built out to incorporate additional response groups for substations, technical test services, operations, and telecom issues in the future.

- Electric Trouble

The Electric Trouble Section controls feeder circuits coming out of distributing stations. The Electric Trouble Section supports Vegetation Management by conducting emergency on-the-spot line clearance tree trimming and by switching or de-energizing distribution circuits to allow Vegetation Management crews to work safely.

Within the City, LADWP operates a 24-hour, 7-day-a-week Electric Trouble Section that responds to hazards and power outage-related issues in the distribution system.

3.3.3 Power Design and Construction Division (PD&C)

PD&C adheres to the Operations and Protocols discussed in Section 7.2, “Operations and Protocols,” below. PD&C also adheres to its internal fire prevention procedures for its General Construction crews, which provide employees with information and guidelines that will assist them in recognizing, reporting, and controlling fire hazards when working near or around electrical equipment. PD&C conducts vegetation management for LADWP’s substations by monitoring and controlling the vegetation growth through monthly station inspections and routine landscape maintenance by the Electrical Station Maintenance group.

PD&C designs, inspects, and maintains LADWP’s overhead and underground transmission lines within and outside of the Los Angeles area. The transmission facilities are used to transport electricity in bulk quantities from generation facilities to distribution facilities over long distances. PD&C includes the Transmission Construction and Maintenance (TCM) section and Substation and Transmission Engineering section.

- Overhead Transmission (OHT)

A key group within PD&C, OHT is responsible for inspection and maintenance of LADWP's transmission lines in three states. These lines are responsible for transporting electricity from generation facilities to receiving stations over large distances across a variety of terrains. Due to the area covered by LADWP's transmission lines, TCM has six manned headquarters located throughout California, Nevada, and Utah. One of the headquarters is located in the Los Angeles Basin and the others are located in Victorville, Mojave, and Bishop, California; Boulder City, Nevada; and Delta, Utah. In addition, TCM has three unmanned locations in Ely, Nevada; and Cedarville, California.

OHT is responsible for responding to any trouble calls relating to the transmission system. This includes line relays, wildfires in proximity to the lines, as well as other issues that could affect the bulk power system. TCM also includes a Right-of-Way Maintenance Group that is responsible for general vegetation management in basin transmission rights-of-way including road maintenance, mowing, and brush removal.

- Substation and Transmission Engineering

Substation and Transmission Engineering adheres to LADWP's construction standards when designing the infrastructure necessary to transmit and distribute power to its customers and communities in a safe and environmentally responsible manner. Design criteria and methods are consistent with industry standards that include, but are not limited to, CPUC's General Orders (GO), American National Standards Institute (ANSI), and the Institute of Electrical and Electronics Engineers (IEEE). All designs meet these criteria to help ensure the reliability and safety of LADWP's grid and service territory.

3.3.4 Substation Operations and Maintenance Division (SOM)

SOM adheres to the Operations and Protocols discussed in Section 7.2, "Operations and Protocols," below. SOM conducts vegetation management for LADWP's substations by monitoring and controlling the vegetation growth through monthly station inspections and routine landscape maintenance by the Electrical Station Maintenance group.

3.3.5 Owens Valley Operations Division

The Owens Valley Operations Division is responsible for overseeing the operations and maintenance of the Owens Valley Electric System, which includes generation, transmission, and distribution infrastructure. The division adheres to the Operations and Protocols discussed in Section 7.2, "Operations and Protocols," below.

Within the Owens Valley, LADWP operates a 24-hour, 7-day-a-week Electric Trouble Section that responds to hazards and power outage-related issues in the local distribution system.

3.3.6 Steam Generation and Hydro-Renewables Divisions

Steam Generation and Hydro-Renewables divisions conduct routine and as-needed inspections and maintenance on LADWP's generation and extra high voltage substation facilities. Their inspection and maintenance activities help reduce the risk of outages and wildfires within generation and extra high voltage substation facilities. Steam Generation and Hydro-Renewables also have an extensive brush clearance program in which its crews remove brush from around its facilities. Crews conduct their inspections in accordance with LADWP's Transmission Maintenance and Inspection Plan and adhere to the Operations and Protocols discussed in Section 7.2, "Operations and Protocols," below, when conducting any work around LADWP's facilities.

3.3.7 Energy Control Center and Grid Reliability Division

The primary group within the Energy Control Center and Grid Reliability Division is the Energy Control Center (ECC). The ECC has centralized operational control over LADWP's Power System, including its transmission and subtransmission systems.

Load dispatchers⁴ at the ECC use the Supervisory Control and Data Acquisition (SCADA) system to monitor and control the operation of some parts of the electrical system during normal and emergency conditions, including energizing and de-energizing individual circuits and blocking or enabling automatic reclosers. On circuits where direct SCADA control is not available, these functions are executed by dispatching field personnel to perform those functions locally. Operation of 4.8-kV circuits (feeders) is closely coordinated with the Electric Trouble Section.

3.3.8 Advanced Technologies Infrastructure Division (ATI)

Key groups within ATI include Distribution Asset Monitoring (DAM), Outage Management System (OMS), and Asset and Resource Application Management (WMIS Team).

In prior years, DAM's predecessor group was responsible for the Power Geographic Information System (Power GIS). Data in this system includes asset information (such as poles and transformers) and some workflow data associated with those assets (such as inspections). The Enterprise GIS group within the Information Technology Services Division (ITSD) is now responsible for maintenance of the Power GIS databases, servers, and applications. DAM continues in its role of data analysis and reporting, and it is the primary contact within ATI for WMP development-related data requests.

The WMIS Team maintains the Work Management Information System (WMIS). This system includes construction and maintenance workflow data relevant to WMP, such as tracking which assets were replaced and which materials were used. DAM gathers information from WMIS and associates that information to the asset and location data

⁴ Load dispatchers, in the context of electric transmission, substation, and distribution operations, have duties comparable to System Operators. Load dispatchers have additional responsibilities including coordinating the purchase, sale, and scheduling of electric energy and associated services.

from GIS to produce various statistics needed for the WMP, such as how many poles were replaced within certain fire zones. DAM works closely with the WMIS Team to address any new requirements that may arise.

OMS receives Power GIS asset and electrical model data and is used to analyze and record outage incidents. DAM works with OMS to compile outage data and associate it with asset and geographic info from GIS, such as identifying if these outages are located within Tier 2 and Tier 3 High Fire Threat Districts (HFTD) and the LAFD Fire Zone. More information on WMP metrics is provided in Section 10.1.4, “Performance Metrics.”

3.4 Water System Executive Office

The Water System Executive Office is responsible for managing all Water System Divisions, supporting Operations and Distribution activities for the multiple Divisions, and achieving Water System goals. The Office comprises the following roles: the Chief Operating Officer and Senior Assistant General Manager of Water System, the Assistant General Manager of Water System, the Director of Strategic Initiatives, the Liaison of the Unified Utilities Rebuild Operations Center, the Chief of Staff, the Utility Administrator V, and the Utility Executive Secretary. These positions, in addition to the Water Operations and Water Distribution Division Directors report to the Chief Operating Officer and Senior Assistant General Manager of Water System.

The Water Quality, Water Resources, and Water Engineering and Technical Services Division Directors report to the Assistant General Manager of the Water System.

The Chief of Staff manages two sections: the Loans and Grants Section and the Innovation and Technology Section.

The Utility Administrator V manages three sections: the Budget Section, the Personnel and Timekeeping Section, and the Safety and Training Section.

The Chief Operating Officer and Senior Assistant General Manager of LADWP Water System oversees the entirety of the Water System and is responsible for overseeing implementation of its WMP commitments.

3.4.1 Water Operations Division (WOD)

WOD is divided into two sections: Metro and Aqueduct Operations.

WOD Metro operates, maintains, repairs, and upgrades the Water System’s water conveyance, storage, and treatment facilities within the LA Metro area. The Repair and Construction Group plans and implements corrective and preventive maintenance for Water System equipment and facilities, including over 50 treatment facilities and 85 pump stations. The Property Management Group manages physical security for water system facilities, inspects, cleans, and repairs tanks and reservoir floating covers, and oversees vegetation management. The Water Technology and Control Systems Group maintains computer-based control systems for water system facilities, including local and remote control systems for transmission and treatment infrastructure.

WOD Aqueduct operates and maintains the First Los Angeles Aqueduct (223 miles long), the Second Los Angeles Aqueduct (139 miles long), nine storage reservoirs, and numerous facilities, construction yards, and patrol stations to support aqueduct operations. The City owns approximately 315,000 acres of land in the Eastern Sierra, including 252,000 acres in Inyo County and 62,000 acres in Mono County. The Aqueduct Real Estate Group manages this land with oversight from Water System Management. The Aqueduct Section has a Memorandum of Understanding with California Department of Forestry and Fire Protection (CAL FIRE) to support firefighting activities in the Owens Valley, as described in Section 7.5.1.

3.4.2 Water Distribution Division (WDD)

WDD is responsible for the construction, operation, and maintenance of the City's water distribution infrastructure. This includes approximately 7,340 miles of pipe, 2,800 large valves, 61,070 fire hydrants, and a wide variety of appurtenances spread over 465 square miles of the Los Angeles Metro area. WDD is responsible for performing repairs to fire hydrants citywide that are identified by the Los Angeles Fire Department (LAFD) through annual inspections, as described in Section 4.4.

WDD also maintains a Water Trouble Board that operates 24 hours a day, 7 days a week to address water trouble issues. These may include leaks, knocked-off fire hydrants and customers' requests for temporary shut offs. The Water Trouble Board dispatches the requests to WDD field crews for assessment and records all pertinent information regarding the event in the Outage Management System.

The Assistant General Manager of the Water Subsystem provides strategic leadership and coordination across water resource planning, system design, construction, and quality oversight. It ensures collaboration among internal divisions and external partners to deliver critical water projects, strengthens community value through continuous improvement, and supports executive leadership in guiding the overall Water System.

3.4.3. Water Quality Division (WQD)

WQD interfaces with the California State Water Resources Control Board's Division of Drinking Water to maintain compliance with all drinking water standards and monitor water quality throughout the Metro and LA Aqueduct Systems.

To keep communities informed about the safety and quality of public water supplies after wildfires, the WQD, supported by the IT division, develops an incident-specific public-facing [Water Quality Restoration Dashboard](#) that provides water quality monitoring results during the response and recovery phases of emergencies impacting drinking water quality.

3.4.4 Water Resources Division (WRD)

WRD is responsible for safeguarding the City's water supply reliability using plans, programs, and policies to develop new and manage existing water resources in an efficient, cost effective, and environmentally responsible manner. Despite changes in

the availability of water supplies and the potential impacts of climate change, LADWP remains committed to ensuring that its customers enjoy the quality of life that comes with a highly reliable water supply. This includes engaging in long-term planning, coordinating, and advocating for investment in water use efficiency, managing existing water resources, and developing new water resources, both locally and regionally.

WRD is also responsible for providing and processing variance requests for customers who are trying to re-establish landscapes that have been lost to fires or for brush management as approved by LAFD. These are known as hardship variances, and they allow those affected by the fires to water more frequently than the Emergency Water Conservation Plan allows.

3.4.5 Water Engineering and Technical Services (WETS)

WETS plans, designs, and delivers infrastructure projects necessary to deliver a high quality, reliable water supply to LADWP customers and provides support services to manage infrastructure optimally. WETS adheres to LADWP's design and construction standards when designing the infrastructure necessary to treat, convey, store, and distribute water to its customers and communities.

WETS planning, design criteria, and methods are consistent and comply with the Los Angeles Fire Code (LAFD) Chapter 5 - *FIRE SERVICE FEATURES – Section 507.3 Fire flow*. For example, in accordance with this Section, water infrastructure such as storage tanks and distribution pipelines serving low-density residential land uses are typically designed to provide 2,000 gpm from three adjacent hydrants flowing simultaneously, while maintaining a residual pressure of 20 psi.

Note that the fire-flow duration is based on guidance from the National Fire Protection Association (NFPA) Handbook, not the LAFD, and is established for each facility in coordination with the Los Angeles Fire Department (LAFD). The required duration for a specific area may change.

The WETS Reservoir Surveillance Group conducts regular inspections of all reservoir dam structures in the Water System and coordinates with the California Division of Safety of Dams to help ensure the integrity and safety of the dams, including those located at non-potable reservoirs used to support aerial firefighting.

WETS also provides Damage Assessment Teams and Reservoir Inspection Teams that are activated in emergencies to evaluate damage to water facilities and dams, respectively.

3.5 Risk and Compliance Office

The Risk and Compliance Office is responsible for managing four enterprise-wide support functions: Risk Management, Regulatory Compliance, Quality Management, and Ethics and Compliance; and for leading the Wildfire Safety Council and Committees.

The Chief Risk and Compliance Officer chairs the Wildfire Safety Council and Steering Committee; leads the enterprise-wide compliance, risk management, and quality management programs; and is responsible for oversight of WMP development and implementation as it relates to these functions.

3.5.1 Risk Management

In 2025, LADWP launched its inaugural Enterprise Risk Management (ERM) Division to strengthen organizational resilience and elevate risk-informed decision-making across the utility. This new division is charged with establishing and sustaining enterprise-wide frameworks that proactively identify, assess, and mitigate risks with the greatest potential impact on LADWP's Strategic Plan⁵.

Key responsibilities include:

- Developing and maintaining an enterprise risk policy that defines LADWP's risk identification approach, taxonomy, risk attitude, tolerances, controls, reporting, and monitoring practices
- Managing an enterprise risk registry focused on identifying and prioritizing safety, reliability, asset, financial, and strategic tail risks—supporting catastrophic loss prevention
- Maintaining an emerging risk watchlist to anticipate and prepare for evolving threats
- Providing advisory support to asset management, project management, insurance and risk transfer functions, and other divisions to strengthen loss prevention strategies
- Ensuring alignment with industry-leading standards, including ISO 31000: Risk Management (2018)
- Coordinating with peer utilities, technical experts, and industry consortia to integrate best practices and benchmarking insights

With respect to wildfire risk mitigation, foundational elements of LADWP's ERM program play a critical role in shaping and updating the Wildfire Mitigation Plan (WMP) risk assessment. The division leads cross-functional collaboration to help ensure that wildfire risk evaluation and mitigation strategies are comprehensive, data-driven, and enterprise-aligned.

3.5.2 Regulatory Compliance

A key group within the Regulatory Compliance Division is the State and Local Regulatory Compliance Group (SLRCG). The core mission of SLRCG is to foster a strong culture of compliance throughout LADWP and to help ensure that LADWP remains compliant with all legislative mandates. Weekly meetings are hosted by SLRCG to inform LADWP management of all state and local regulatory updates.

With respect to the WMP, SLRCG's role includes, but is not limited to, the following:

⁵ LADWP Strategic Initiatives available online via <https://www.ladwp.com/strategic-initiatives>

- Monitor legislation, regulations, and industry standards related to WMPs for publicly owned electric utilities
- Assess compliance with applicable rules and regulations as they relate to WMPs for local publicly owned utilities
- Coordinate with LADWP stakeholders, notably including the California Municipal Utilities Association (CMUA) Wildfire Preparedness, Response and Recovery Working Group, to incorporate relevant information into the WMP

SLRCG continues to provide awareness of relevant activities that may impact the WMP and aims to coordinate routine WMP updates as needed.

3.5.3 Quality Management

LADWP is developing an enterprise Quality Management System (QMS) that will include quality assurance, quality control, and quality auditing. The newly developed QMS will provide a structured framework that defines and documents LADWP's processes, procedures, and responsibilities in accordance with industry-standard quality policies, practices, and objectives.

The goal of LADWP's QMS is to help mitigate risks, reduce waste, increase efficiency and improve stakeholder satisfaction. With respect to wildfire risk mitigation, Quality Control plays a key role across operational programs, supporting field activities, inspections, and ongoing maintenance. The Quality Management Systems (QMS) promotes consistency, accuracy, and continual improvement in processes, documentation, and data management. To varying degrees, the QMS underpins all operational processes described within the Wildfire Mitigation Plan.

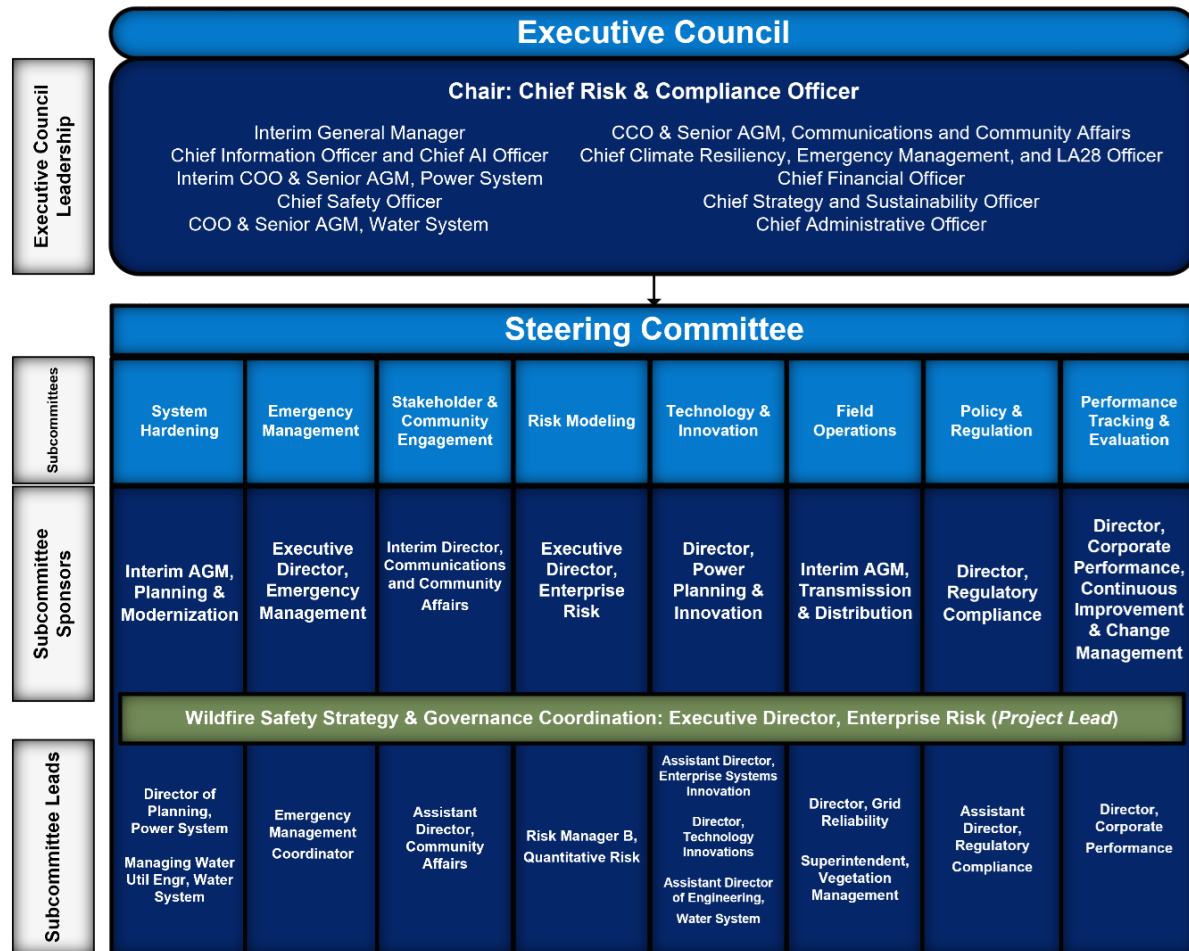
3.5.4 Ethics and Compliance

The enterprise-wide Ethics and Compliance function allows LADWP to develop and sustain programs, initiatives, and other activities that are proven to sustain integrity. With respect to wildfire risk mitigation, this LADWP function helps to improve or maintain ethical behaviors and support audit results.

3.5.5 Wildfire Safety Risk Governance

Centrally facilitated by the Enterprise Risk division, the organizational structure for Wildfire Safety Risk Governance includes the Wildfire Safety Executive Council, the Wildfire Safety Director Steering Committee, various Wildfire Safety Subcommittees, and modular Tactical Teams as needed. An organizational chart showing the enterprise roles comprising the Executive Council, Steering Committee, and Subcommittee leads is presented in Figure 3-2.

Figure 3-2: Wildfire Safety Risk Governance Organizational Chart⁶



3.5.5.1 Wildfire Safety Executive Council

The Executive Council serves as the top decision-making body within the wildfire mitigation governance structure and is comprised of the Interim General Manager's direct reports. The Executive Council is responsible for setting strategic direction, approving high-level recommendations, and ensuring alignment with departmental priorities and regulatory expectations.

The objectives of the Executive Council are:

- Approve major policy, funding, and operational recommendations
- Oversee and provide direction to the Steering Committee and subcommittees
- Facilitate intradepartmental and interagency alignment

⁶ AGM refers to Assistant General Manager, COO refers to Chief Operating Officer, CCO refers to Chief Customer Officer

- Serve as the final decision-making authority for escalated issues

3.5.5.2 Wildfire Safety Director Steering Committee

The Steering Committee translates the Executive Council's strategic direction into actionable initiatives. The Steering Committee is responsible for ensuring coordination, subject matter guidance, and issue resolution across all wildfire subcommittees, and functions as a conduit from the subcommittees to the Executive Council.

The objectives of the Steering Committee are:

- Translate strategic priorities into actionable plans
- Coordinate across subcommittees and facilitate alignment
- Identify emerging issues and escalate major decisions to the Executive Council
- Monitor subcommittee progress and address resource or operational gaps

3.5.5.3 Wildfire Safety Subcommittees

There are eight subcommittees under the direct coordination of the Steering Committee. The name, purpose, and core focus for each subcommittee are presented in Table 3-1 below.

Table 3-1: Subcommittees to the Wildfire Governance & Steering Committee

Subcommittee Name	Purpose	Core Focus
System Hardening & Grid Resiliency	• Reduce infrastructure wildfire risk • Develop and support GIS asset data mapping • Incorporate substation automation systems • Overhead-to-underground line conversions • Establish measurable metrics to evaluate impact • Phased planning approach • Implementation through cross-divisional coordination	• Targeted upgrades such as continued deployment of covered conductors and fire-resistant poles, improved vegetation management systems, and frequent inspection in high-risk areas • Integrate asset data with monitoring systems such as cameras and live wildfire and weather data feeds • Prioritize distribution and transmission system automation upgrades in high-risk areas, allowing for remote operation, real-time monitoring, and other modernization capabilities • Targeted and prioritized overhead line conversions based on risk and feasibility

Subcommittee Name	Purpose	Core Focus
		- Continued monitoring of PSRP replacements and set new goals for high-risk areas; may measure progress in automation, targeted asset replacements and undergrounding; quantify and continuously monitor resiliency and redundancy - Address immediate needs and risks; develop long-term strategies to ensure continued resilience in a changing climate - Clearly define milestones, responsibilities, and KPI targets for successful implementation of agreed strategies - Risk-based asset prioritization and engineering assessments
Field Operations	Convey frontline construction and operational worker perspectives and drive the delivery of infrastructure mitigations and best practices in protocols, tools, and training related to wildfires	- Develop HFTD Power System infrastructure hardening construction standards - Develop protocols for safely operating Power System tools and equipment in the HFTD - Implement and monitor performance metrics for vegetation management in HFTD - Oversight for the Proactive De-Energization Tactical Team
Technology & Innovation	Evaluate, pilot, and recommend emerging technologies that support wildfire detection, prediction, and system resiliency	- Vegetation management technologies (i.e., LiDAR, remote sensing) - AI-based situational awareness tools for real-time risk analysis - Vetting new vendor tools and cross-utility partnerships - Integration of aerial systems for rapid fire detection and assessment - GIS Mapping and infrastructure visibility; coordination with LAFD, CALFIRE, and other

Subcommittee Name	Purpose	Core Focus
		agencies to maintain visuals for emergency response and planning
Stakeholder and Community Engagement	Facilitate inclusive, transparent engagement with customers, neighborhood councils, community leaders and elected officials in wildfire-prone areas	- Establish and conduct outreach and communication to impacted customers, including the medically dependent, elderly and businesses - Inform and coordinate with neighborhood councils, elected officials, partner agencies and workforce partners - Communication materials and protocols for impacted stakeholders and audiences - Education campaigns for preparedness and emergency protocols
Risk Modeling	Develop quantitative wildfire risk models to inform planned mitigation investments and real-time operational decisions	- Assess and implement risk modeling tools, utilizing both internally derived and third-party resources - Maintain a feedback loop with Power and Water system leaders to aid in prioritizing risk-informed planned asset investments
Performance Tracking & Evaluation	Develop performance metrics and further accountability through ongoing tracking of WMP milestones and deliverables	- Project tracking dashboards and milestone reviews - KPI development aligned with the Wildfire Safety Advisory Board - Mid-year and annual progress reports - Budget/resource efficiency and return on investment evaluation - Predictive analytics for ignition and wildfire modeling - Customer notification systems and outage dashboards
Emergency Operations	Strengthen operational readiness by integrating real-time intelligence and	Situation Awareness & Lessons Learned

Subcommittee Name	Purpose	Core Focus
	historical insights, establishing clear wildfire-related operational protocols with robust emergency communications, and conducting simulated events to test and validate response capabilities.	- Facilitate after-action reviews and capture lessons learned from storm and fire events - Participation in joint utility wildfire consortiums - Integration of Blue Ribbon Commission recommendations Operation Protocols & Emergency Response Planning - Develop internal protocols for wildfire-related operations with robust emergency communication planning - Emergency restoration logistics and prioritization Tabletop & Operational Exercises - Lead multi-agency tabletop exercises (i.e., LAFD, LA Emergency Management Department, California Governor's Office of Emergency Services) - Lead complex EOC activation and simulated outages, evacuations, and restoration events
Policy & Regulation Alignment	Align LADWP's wildfire strategies with local, state, and federal regulatory expectations and emerging wildfire legislation	- Review of all wildfire-related regulatory requirements - Facilitate discussions with various internal groups, such as Legislative and Intergovernmental Affairs in coordination with other entities, including but not limited to Los Angeles Fire Department (LAFD) and Los Angeles Emergency Management Department (EMD)

3.5.5.3.1 Wildfire Safety Tactical Teams

As needed, Tactical Teams are formed to address short-term objectives as directed by Subcommittee leaders. The name, purpose, and core focus for each Tactical Team are presented in the table below.

Table 3-2: Tactical Teams Directed by Wildfire Safety Subcommittees

Tactical Team Name	Purpose	Core Focus
Proactive De-Energization Tactical Team	Assess the feasibility and applicability of a proactive de-energization protocol	- Analyze wildfire risk profile and the effectiveness of proactive de-energization systems among other mitigation solutions. - Continuing to expand SCADA capability in substations in all voltage classifications. - Evaluate the feasibility of extending SCADA functionality into targeted field devices that would have the greatest impact on strengthening our mitigation measures. - Assess protocol applicability for various equipment categories, considering factors such as voltage class, physical environment, and wildfire-risk exposure. - Identify factors that impact availability of data to support customer and community notification protocols.

3.6 Office of Emergency Management (OEM)

The LADWP OEM coordinates with all other City Departments that play key roles in preparing for, responding to, and recovering from emergencies. During emergencies, OEM coordinates with Los Angeles City Departments who have pre-defined key response roles. As LADWP's communication channel to the City, OEM acts as a liaison with the LAFD.

LADWP has a long-standing working relationship and communication protocol with the LAFD before, during, and after wildfire events. Within the City, LAFD oversees direct communication with County of Los Angeles Fire Department (LACoFD) and CAL FIRE before, during, and after wildfire events. Information from LACoFD or CAL FIRE is disseminated through this communication chain.

OEM represents LADWP within the City's Emergency Operations Organization (EOO) which is described in Section 8.1, "Emergency Operations Organization (EOO)." OEM is also responsible for coordinating the deployment of LADWP's Emergency Command Post Vehicles (ECPVs), mobile coordination and control facilities used to respond to LADWP incidents. The ECPVs provide mobile, on-scene resources with which LADWP can conduct restoration operations in an efficient and uninterrupted manner with proximity to the incident to aid in timely response.

The Chief Climate Resiliency and Emergency Officer oversees emergency management programs and operations and is responsible for overseeing support to WMP development and implementation as it relates to these functions.

3.7 Office of Chief Customer Officer

LADWP recognizes that it is operating on behalf of LADWP customers and for the welfare of all residents and businesses in its service area. LADWP strives to provide customers and the public with timely response and support, including clear, concise, and accurate information about incidents that impact them and activities of LADWP responders during such incidents or emergencies.

3.7.1 Customer Service Division (CSD)

CSD is dedicated to providing respectful, responsive, and dependable customer service. CSD also has an integral role in relaying information to the public regarding LADWP's response to hazard related outages.

CSD consists of nine major groups with more than 1200 employees. CSD employees provide service and support to LADWP's approximately 1.56 million electric and 679,000 water customer accounts, while also supporting other LADWP groups that deliver those services. The following CSD groups have been identified as key groups involved in the WMP.

3.7.1.1 Customer Contact Center (CCC)

The CCC provides an essential public service for customers across the greater Los Angeles Basin and Owens Valley. Customers rely on the CCC to communicate information and provide emergency response assistance 24 hours a day, 7 days a week for issues such as downed power lines, water leaks, and other occurrences. The CCC is critical in providing up-to-date information for incident response and restoration efforts to customers affected by wildfires.

3.7.1.2 Customer Service Center (CSC)

CSD has 14 CSCs located throughout the Los Angeles area. The centers provide in-person customer support, outreach, and education, while also promoting a community-centric presence. These centers can facilitate contact with support services to victims of wildfires in the communities they serve.

2.7.1.3 Customer Services Support (CSS)

The CSS team manages the technical portions of the LADWP website, www.LADWP.com. In addition to hosting a WMP landing page where the public can access LADWP's current and previous WMPs, the website offers updates, public service notifications, and water and power outage maps where customers can see and report service interruptions.

CSS also administers LADWP's customer relationship management (CRM) system, which is used to send Community Subscription Notifications. Customers who subscribe to this service receive text and/or email notifications for power outages that affect their communities. Notifications can be customized to provide up-to-date information for incident response and restoration efforts to subscribers affected by wildfires. In addition to the outage notifications, CSS can provide email outreach support utilizing the CRM system for targeted communication efforts.

3.7.1.4 Key Accounts Section (KAS)

LADWP's Key Accounts Team is responsible for providing an excellent customer experience to LADWP's largest commercial and industrial customers. Eligible customers are assigned "Premier" status thus having a dedicated Account Advisor assigned to their accounts. The Key Accounts Team is the primary lead in communication with this customer segment for planned and unplanned outage notifications on the 34.5 kV system and can also facilitate emergency response communications.

3.7.2 Communications and Community Affairs (CCA)

The Communications and Community Affairs (CCA) Division plays a critical role in protecting LADWP's organizational reputation, ensuring accurate and timely public messaging, and leading comprehensive communications before, during, and after power emergencies, including those driven by wildfire risk.

CCA supports LADWP throughout crisis incidents by coordinating closely with operational divisions to obtain, verify, and approve information for release to key stakeholders. These stakeholders include news media outlets, customers, employees, neighborhood councils, community organizations, partner agencies and business groups. CCA also works in close coordination with the Legislative and Intergovernmental Affairs (LIGA) Division to communicate with the offices of elected officials. During emergencies, CCA ensures that all public-facing information is consistent, accurate, and reflective of LADWP's operational posture.

In an Incident Command response, CCA serves as the Public Information Officer (PIO), or integrates into broader City emergency communication structures such as the City's Emergency Operations Center (EOC) or unified command led by agencies like LAFD during wildfire events, apart from LADWP's own Department Emergency Operations Center (DEOC). This role is essential to shaping clear, actionable public messaging, maintaining situational awareness, and reinforcing trust between LADWP and the communities it serves.

CCA also provides essential communication regarding hazard-related outages. To meet the diverse needs of stakeholders, CCA employs a multi-channel, accessible communication strategy that includes direct customer engagement, web and digital publishing, email notifications, SMS/text alerts, automated phone messaging, and social media. Information is available in the City's Language Access Plan Tier 1 languages, if necessary. This ensures that the public receives timely updates, safety guidance, and restoration information.

In the context of wildfire mitigation, CCA's work helps articulate LADWP's wildfire mitigation strategies, communicates safety-critical information during heightened weather conditions, and supports preparedness efforts. CCA contributes to building public understanding of weather risks and grid-hardening measures. The Division is also playing a key role in the development of plans to reduce ignition risks in high-fire-threat areas, including LADWP's own version of Public Safety Power Shutoffs. Through proactive outreach and responsive crisis communication, CCA strengthens community readiness, supports internal alignment, and safeguards LADWP's role as a responsive, trusted, transparent public utility.

3.8 Enterprise Strategy & Sustainability

Enterprise Strategy & Sustainability plays an important role in supporting the WMP by helping to align LADWP on overall enterprise goals, which includes public safety and corporate performance, both of which help enforce and emphasize the importance of updating and adhering to LADWP's WMP. From a sustainability perspective, biodiversity and nature-based solutions can help facilitate the implementation of a WMP by establishing resiliency zones and promoting land stewardship. Lastly, Enterprise Strategy & Sustainability provides support where needed for WMP development and improvement initiatives, including but not limited to lessons learned, benchmarking, and potential changes in standards.

4.0 Overview of Service Territory

4.1 Power System – WSAB-Requested Information

LADWP provides the table below per the recommendation of the Wildfire Safety Advisory Board⁷ (WSAB) to assist the WSAB staff and Board members in understanding the unique characteristics of LADWP's service territory.

Table 4-1: LADWP Service Territory Information

Utility Name	Los Angeles Department of Water and Power	
Service Territory Size	City of Los Angeles: 478 square miles Owens Valley: 1,839 square miles	
Owned Assets	☒ Transmission ☒ Distribution ☒ Generation	
Number of Customers Served	Approx. 1.6 million customer accounts	
Population Within Service Territory	Approx. 4 million people	
Customer Class Makeup	Number of Accounts	Share of Total Load (MWh)
	90% Residential; 1% Government; 0% Agricultural; 8% Small/Medium Business; 1% Commercial/Industrial	41% Residential; 10% Government; 0% Agricultural; 10% Small/Medium Business; 39% Commercial/Industrial
Service Territory Location/Topography⁸	The City of Los Angeles covers 478 square miles consisting mostly of urban environment with parcels of shrub environment near the Santa Monica Mountains, a portion of the Verdugo Mountains, and small areas located on the outer edges of the city. The Owens Valley covers 1,839 square miles consisting of mostly desert environment with parcels of conifer forest, conifer woodland, herbaceous, and shrub environments on the west between the Sierra Nevada Mountains and U.S. Route 395 and parcels of conifer forest, conifer woodland, and shrub environment on the east near the White Mountains.	

⁷ <https://energysafety.ca.gov/what-we-do/wildfire-safety-advisory-board/>

⁸ This data shall be based on the California Department of Forestry and Fire Protection, California Multi-Source Vegetation Layer Map, depicting WHR13 Types (Wildlife Habitat Relationship classes grouped into 13 major land cover types) available at: <https://www.arcgis.com/home/item.html?id=b7ec5d68d8114b1fb2bfbf4665989eb3>.

	Further detail on topography within LADWP's service territory can be seen in the maps included in the Appendices of this Wildfire Mitigation Plan.
Service Territory Wildland-Urban Interface⁹ (based on total area)	3.03% Wildland-Urban Interface; 1.26% Wildland-Urban Intermix;
Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	☒ Includes maps (see Appendix B) Tier 2: 20% Tier 3: 1%
Prevailing Wind Directions & Speeds by Season	☒ Includes maps (see Appendices) The City is occasionally affected by the Santa Ana Winds. They are most prevalent during the cooler months of the year, occurring from September through May. The National Weather Service defines the Santa Ana Winds as "strong down slope winds that blow through mountain passes in Southern California." The Santa Ana Winds may increase wildfire risk due to their dryness and the speed at which they can spread a flame across the landscape. These high, dry, and warm winds may also present a potential risk to LADWP's overhead electric power lines as vegetation can disrupt power if blown into the lines. Areas most affected by these high winds have been designated as High Wind Zones by the City. Those Zones are reflected in LADWP's Fire Threat Map and are treated the same as Tier 2 High Fire Threat Districts (HTFDs). LADWP has also developed construction standards for High Wind Zones to address these risks. Additionally, LADWP uses the Santa Ana Wildfire Threat Index and weather information from National Oceanic and Atmospheric Administration and the City of Los Angeles Fire Department (LAFD) to monitor current and forecasted weather data.
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: 7,262 miles Overhead Trans.: 4,081 miles Underground Dist.: 3,885 miles Underground Trans.: 136 miles Explanatory Note 1 - Methodology for Measuring "Miles": The mileage listed above refers to LADWP circuit miles.

⁹ This data shall be based on the definitions and maps maintained by the United States Department of Agriculture, as most recently assembled in *The 2010 Wildland-Urban Interface of the Conterminous United States*, available at https://www.fs.fed.us/nrs/pubs/rmap/rmap_nrs8.pdf.

	Explanatory Note 2 – Description of Unique Ownership Circumstances: LADWP solely or jointly owns 4,081 miles of overhead transmission lines and 136 miles of underground transmission cable located within and outside of its service territory.
	<i>Overhead Distribution Lines as % of Total Distribution System</i>
Percent of Owned Lines in CPUC High Fire Threat Districts	Tier 2: 13.5% Tier 3: 0.4%
	<i>Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)</i>
	Tier 2: 1.3% Tier 3: 8.6%
	Explanatory Note 3 – Additional Relevant Context: LADWP has calculated these percentages by utilizing the total circuit mileage that falls within Tier 2 or Tier 3 HFTDs as the numerator and the total circuit mileage of LADWP's Overhead Distribution and Transmission Lines, respectively, as the denominator.
Customers have ever lost service due to an Investor Owned Utility (IOU) PSPS event?	☐ Yes ☒ No Disclaimer: LADWP is not an IOU and does not track this metric.
Customers have ever been notified of a potential loss of service due to a forecasted IOU PSPS event?	☐ Yes ☒ No Disclaimer: LADWP is not an IOU and is not aware of whether LADWP customers received any notifications of IOU Public Safety Power Shutoff (PSPS) Events.
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	☐ Yes ☒ No Please see section 7.2.6.3 of this report for more information regarding current efforts to assess the use of a proactive de-energization protocol.
Has previously preemptively shut off electricity in response to elevated wildfire risk?	☐ Yes ☒ No If yes, then provide the following data for calendar year 2024: <i>Number of shutoff events:</i> [____] <i>Customer Accounts that lost service for >10 minutes:</i> [____] <i>For prior response, average duration before service restored:</i> [____]

Additional information on LADWP's service territory and assets is presented in Section 5.3, "Wildfire Risk Assessment."

4.2 High Fire Threat Districts (HFTDs)

4.2.1 Background

Specific information on the location of LADWP assets located in fire threat zones is presented in Section 5.3.1, "LADWP Service Territory – Assets in Fire Threat Zones." For several years, LADWP worked with CAL FIRE and CPUC to develop the CPUC Tier 2 and Tier 3 HFTDs map.

LADWP has developed enhanced maps and elevated construction standards to help mitigate the risk that a wildfire could be started by its electrical lines and equipment. As early as February 2008, LADWP developed High Wind and Fire Area maps along with new Construction Standards (C030) for these areas.

4.2.2 Fire Threat Maps

After the CPUC approved a new Tier 2 and Tier 3 HFTDs map, LADWP updated its High Wind and Fire Area map to include the CPUC-approved Tier 2 and Tier 3 HFTDs. This map, in conjunction with the City of Los Angeles Very High Fire Hazard Severity Zone (LAFD Fire Zone), was used to create the LADWP Fire Threat Maps shown in Appendix B, "LADWP Fire Threat Maps." LADWP's transmission assets are also outlined on these Fire Threat Maps.

The addition of the LAFD Fire Zones provides LADWP with an intermediary zone around the Tier 2 Elevated Fire Threat Districts. From a system planning, construction, and operations perspective, LADWP treats the LAFD Fire Zones as Tier 2 areas and applies the same wildfire prevention strategies to further mitigate wildfire risks.

When Fire Threat Maps are changed, bulletins are issued to all affected LADWP personnel to ensure timely and key considerations are made when performing construction, inspection, maintenance, repair, and clearance practices.

4.2.3 Most Recent Update

On March 24, 2025, the California Wildlife and Forest Resilience Task Force released its "2025 Key Deliverables" and provided the following information in the section named **Improve Home and Community Wildfire Resilience:**

"2. Update and Release Fire Hazard Severity Zone Maps: *The State Fire Marshal is responsible for periodically updating Fire Hazard Severity Zone maps, which identify which areas are most vulnerable to fires and therefore are subject to updated state and local fire safety regulations. The maps for state responsibility areas (SRA) where the state is responsible for putting out fires were released in 2024. The Governor's Executive Order directs the Office of the State Fire Marshal to release updated Fire Hazard Severity Zone maps for areas under local government responsibility (LRA) beginning in February 2025.*

Action: *The State Fire Marshal began releasing the Local Responsibility Area maps in a phased approach, starting with the maps for Northern California on February 10, North Coast and Bay Area on February 24, Central Valley and Coast on March 10, and Southern and Eastern California on March 24.*

After any changes are made to the State Fire Marshal maps, and if the CPUC or LAFD adopts such changes to its fire zones, then LADWP will update its Fire Threat Maps and associated construction standards.

4.3 January 2025 Wildfires in Los Angeles

4.3.1 Background

Multi-year climate conditions, including above-average winter rainfall in the Los Angeles region from 2022 through 2024, had facilitated abundant vegetation growth. The vegetation was desiccated by an unusually dry fall and early winter with record-low precipitation, leading to a dramatic increase in “fuel load” and low moisture levels. In the months preceding the January 2025 wildfires, Southern California faced a rare and challenging convergence of conditions. Immediately preceding and during the fires, extreme Santa Ana winds started to blow down from the Great Basin, with sustained wind speeds of up to 70 miles per hour and gusts up to 100 miles per hour. These conditions created an environment highly susceptible to rapid wildfire spread, if ignited.

In January 2025, wildfire erupted in Pacific Palisades, Los Angeles, among other places. The Pacific Palisades, a neighborhood in the Westside region of the city of Los Angeles, is in LADWP’s service territory. The Palisades Fire resulted in civilian fatalities, civilian and firefighter injuries, burned over 23,000 acres, and destroyed thousands of structures. The Palisades Fire was fully contained on January 31, 2025.

4.3.2 Water System Response

After the National Weather Service issued a Red Flag Warning shortly before January 7, 2025, LADWP began refilling its functioning water tanks and reservoirs as much as possible in order to support fire suppression activities.

LADWP’s Water System complies with Los Angeles City Fire codes. However, the Palisades Fire demonstrated that no municipal water system can maintain sufficient water pressure for sustained periods when a wildfire enters urban areas leading to extraordinary water demands. During the Palisades Fire, an unprecedented amount of water was being drawn from the Palisades’ water system by homeowners, firefighters, damaged pipes, etc., which caused water pressure in certain pressure zones to drop substantially. While an adequate supply of water remained available from the Upper Stone Canyon Reservoir throughout the fire, extraordinary demand for water from firefighting efforts and thousands of open water connections caused pressure in those zones to decrease. One impact of the reduction in pressure was that hours into the Palisades Fire, water pumps that raised water to higher elevations automatically shut down. Pumps are designed to automatically shut down in low-pressure conditions because they rely on water running through them for cooling and to avoid damage to the

pumps. Those pumping stations fed tanks that service certain high-elevation neighborhoods, so the loss of water pressure to the pumping stations eventually led to the tanks running out of water. That, in turn, meant that some hydrants that relied on these tanks for their water ran dry.

LADWP took several steps in an attempt to provide additional water to firefighters. For example, LADWP ensured all open-air reservoirs were available for aerial firefighting and deployed water tankers to the area. LADWP asked Metropolitan Water District to activate a valve called LA-29. LADWP also redeployed crews as soon as it was safe to physically shut off water to burned and destroyed structures and various access points where water was still unnecessarily flowing.

4.3.3 Power System Response

The Pacific Palisades Electric Distribution System is served primarily by two distributing stations DS-29 and DS-99. These stations distributed power to commercial and residential customers through approximately 79 miles of 4,800-volt distribution lines, 52 of which were overhead and 27 of which were underground in conduits. Approximately 20 miles of overhead conductors were damaged by the fire, and 1,825 poles had to be rebuilt or upgraded – requiring more power capacity. LADWP Power System immediately established a forward operating command center the first week following the fire and restored the distribution system to standing structures having no damage by March 21, 2025. LADWP issued the Long-Term Recovery Plan (LTRP), which further elaborates on the rigorous electric system recovery efforts taking place in the Pacific Palisades community.

4.3.4 Rebuilding the Pacific Palisades

LADWP opened the Unified Utilities Rebuild Operations Center (UUROC) in late January 2025 to support the Pacific Palisades rebuilding effort. In February 2026, UUROC operations were relocated to the City's Palisades Inspections and Permitting Support Center. The full-service center is where customers and contractors can coordinate directly with LADWP and other City Departments on the rebuilding of properties and restoration of water and power services to homes and properties in the Pacific Palisades.

As part of the long-term rebuilding efforts, LADWP has hardened 7 miles of overhead distribution lines by installing steel poles and is currently in the design stage of undergrounding 45 miles of the existing overhead lines that serve residential neighborhoods. LADWP has completed the installation of approximately two miles of underground conduit on Sunset Blvd, including 32 substructures as part of the six-mile distribution corridor that will be used to bring additional capacity to the Palisades and upgrade the distribution voltage to a 12,000-volt system. DS-29 will add 60 megawatts (MW) of capacity to serve the current and future demand of the Palisades as businesses and homes are anticipated to require bigger electric services due to increased electrification loads like EV charging, electric appliances, and larger homes.

The Palisades Wildfire was a tragedy for the entire City of Los Angeles, but particularly for the Angelenos who lost their lives, homes, or businesses in the wildfire. The devastated communities continue the long journey of recovery, rebuilding, and healing, and LADWP remains committed to supporting those efforts.

4.3.5 Presidential Action – Executive Order

On June 12, 2025, President Trump signed an executive order, entitled [*Empowering Commonsense Wildfire Prevention and Response*](#), which addresses the devastation caused by the January 2025 Los Angeles wildfires and aims to improve the response to such disasters by streamlining federal wildfire capabilities and promoting local strategies for land management and wildfire response.

The executive order required specific U.S. Cabinet members and various federal agencies to initiate respective actions as follows:

- **Streamlining Federal Wildland Fire Governance:**
 - Consolidate wildland fire programs to achieve efficient use of resources and recommend additional measures, as necessary.
- **Encouraging Local Wildfire Preparedness and Response:**
 - Expand partnerships and agreements to empower local land management and wildfire response.
 - Develop a comprehensive technology roadmap to enhance wildfire firefighting capabilities at the state and local levels.
- **Strengthening Wildfire Mitigation:**
 - Consider modifying or rescinding rules that impede the use of preventive measures like prescribed fires and fire retardants.
 - Promote innovative uses of woody biomass and forest products to reduce fuel loads.
- **Modernizing Wildfire Prevention and Response:**
 - Identify and make publicly available historical satellite datasets to improve wildfire prediction and response.
 - Identify and consider eliminating rules that impede wildfire prevention and response.
 - Prioritize the sale of excess aircraft and parts to support wildfire mitigation and response.

Additional information on the current state of LADWP's firefighting support is provided in Section 7.5, "Agreements with CAL FIRE on Firefighting Support."

4.3.6 Governor Action – Executive Order

Governor Newsom's March 2025 executive order¹⁰ and accompanying letter set several important obligations for LADWP as it rebuilt electric infrastructure in Pacific Palisades after the wildfire. Beyond generally encouraging system hardening, the directive required LADWP to *prioritize undergrounding* distribution power lines in the affected areas "to the extent feasible," making undergrounding a default expectation rather than an optional measure. The order temporarily waived major regulatory hurdles—including CEQA and certain Coastal Act requirements—to ensure LADWP could move quickly. It also required LADWP to prepare and submit a formal undergrounding implementation plan, developed in coordination with other utilities, and to demonstrate that its approach would be both cost-effective and timely. In practice, this meant LADWP was obligated to assess all damaged or planned replacement infrastructure in the Palisades for undergrounding suitability, justify any exceptions, and integrate the work into an accelerated rebuild schedule enabled by the state's emergency permitting suspension.

4.4 Water System

The LADWP operates and maintains a vast water system, including more than 7,300 miles of distribution mains and trunk lines, 115 tanks and reservoirs, 85 pump stations, 329 pressure regulator and relief stations, and over 60,000 fire hydrants across 111 system pressure zones. The Water System supplies an average of 164 billion gallons of water annually to over 735,000 water service connections citywide.

In fire events where water pumping support is required, LADWP's pump stations are generally equipped with backup internal combustion engine-driven pumps that will automatically start to help ensure at least one pump can continue to operate in case of power outage. Conditions permitting, portable generators can also be dispatched and connected to the pump stations' switchgears to provide another source of backup power when there is a loss of utility power.

The Water System also has potable water storage facilities (tanks and reservoirs) that can be available for use during fire events. Furthermore, LADWP maintains several very large non-potable water storage facilities totaling 8.7 billion gallons of storage capacity that can be available for use during wildfire events. The non-potable reservoirs in the Los Angeles Metro area include Encino, Lower Stone Canyon, Lower Hollywood, and Silver Lake Reservoirs. Outside of the Los Angeles Basin, Bouquet Canyon Reservoir, located west of Palmdale, and Fairmont Reservoir, located west of Lancaster, can be available.

Should the need arise, LADWP's crews are available to provide support in water distribution system operations related to firefighting efforts. There are formal agreements with LAFD and Los Angeles County Fire Department on the use of LADWP's potable and non-potable water storage facilities and helipads within the Los Angeles Metro and Aqueduct areas, as well as over 60,000 fire hydrants citywide that are available to support firefighting efforts.

To facilitate availability for firefighting, the LAFD conducts annual inspections of these hydrants under a funding agreement with LADWP. LAFD submits lists of hydrants requiring further assessment and/or repairs to LADWP on a periodic basis. LADWP is responsible for repairing

¹⁰ Executive Order N-24-25, signed by Governor Gavin Newsom on March 27, 2025

any public hydrants that require it. LADWP currently tracks the status of hydrant assessments and repairs using a GIS-based dashboard application. In addition, LADWP has developed an ArcGIS-based dashboard application for LAFD to record its hydrant inspection results in the field and make the information available to LADWP crews in real time.

To promote the safety of public water supplies after wildfires, California Assembly Bill 541 (AB541) was passed in 2023. Under AB541, the State Water Resources Control Board – Division of Drinking Water (CA-DDW) issues Orders to affected water systems when a fire impacts over 300 acres and there is a loss of water pressure in the distribution system. These Orders mandate several critical actions:

1. Issuing an Unsafe Water Alert (i.e. Do Not Drink) to inform the public of potential hazards.
2. Flushing water lines to remove contaminants.
3. Stagnating water lines to collect samples and conduct comprehensive testing for volatile organic compounds (VOC) to identify any contamination.

LADWP coordinates closely with CA-DDW to determine when such alerts must be issued. VOC contamination that is detected must be removed, either by flushing, isolating, or replacing impacted water lines. CA-DDW must concur with Water System proposals and actions in order to lift the Unsafe Water Alert.

CA-DDW generally requires Unsafe Water Alerts to be issued when the system pressure is below 5 psi.

In addition, when fire destroys a structure and there is a lack of water pressure, there is a risk that contaminants can enter the customer's premise plumbing. Therefore, it is important for customers to replace all pipe material on the customer side of the meter before rebuilding and re-occupying the residence. This is to prevent the spread of contaminants into the community's water distribution system. In order to prevent the movement of this contamination, customers in a structure that was damaged 50% or more by fire (as surveyed by CAL FIRE or red tagged by the City of Los Angeles Department of Building and Safety) should either replace all customer side plumbing before re-connecting to the LADWP system or confirm that their plumbing is clear of contaminants using standard test methods for wildfire contaminants after a designated 72-hour stagnation period.

5.0 Wildfire Risk Management Program

5.1 Enterprise Risk Management (ERM) Program

The ERM Program is the set of processes, strategies, practices, and activities that collectively provide a structured framework for managing risks across the organization.

5.1.1 Background

In 2023, LADWP utilized a consulting firm with extensive risk management experience to assess the current state of LADWP's ERM Program and to provide recommendations on how to improve it. These experts performed a comprehensive enterprise risk assessment to help LADWP better align business objectives and risk decision-making across the organization.

The enterprise risk assessment included a thorough review of existing LADWP ERM-related documentation and numerous discussions or communications with LADWP stakeholders. During the assessment, LADWP views were examined on the following risk attributes:

- Severity – The potential damage that a risk event could cause
- Likelihood – The chance of the risk event occurring in a single year
- Velocity – The expected speed with which the risk will affect operations, once an event occurs
- Mitigation Effectiveness – The perceived effectiveness of management's current risk mitigation activities and controls

These were critical initial steps in understanding and prioritizing risk management activities across the enterprise. However, it is important to note that the enterprise risk assessment was not intended to assess current LADWP issues or remediation efforts, nor was the risk assessment intended to be the only input for prioritization of enterprise-wide risk management activities.

5.1.2 Current State

The enterprise risk assessment recommended certain improvements to LADWP's ERM program. Completion of the recommended improvements will help align all LADWP risk management activities with business strategy, provide enterprise-wide standard procedures, and eliminate any remaining siloed risk management activities that exist across the organization. It will also help facilitate a consistent enterprise-wide understanding of the risks that could impact LADWP's ability to achieve its priorities, as well as those risks that the organization was willing to take to achieve its goals. As a result, since October 2025, Enterprise Risk Management leads LADWP's Wildfire Safety program, serving as the facilitator of dialogue between all levels of leadership. Please refer to section 3.5.5 Wildfire Safety Risk Governance for more information regarding how this ERM function is organized.

5.1.3 Strategic Vision for ERM Program

The creation of a new LADWP Chief Risk and Compliance Officer role in January 2025 led to increased communication with external assessment facilitators, prioritization of the draft risk assessment results, and an ongoing review of draft recommended improvements. The strategic vision for the ERM program over the next several years is to:

Define ERM Governance Framework

- Establish a straightforward governance framework including risk taxonomy, risk matrix, scoring, and mitigation inventory. Align on key organizational partnerships to deliver on Department strategy. Deliver enterprise risk management policies, including risk rating criteria, annual risk assessments, risk mitigation plans, and defined risk metrics and reporting requirements.

Create Enterprise Risk Registry

- Build the initial registry listing top enterprise risks ranging from five to seven key risks. Raise awareness of risk principles and mature risk ownership throughout the Department. Perform baseline assessment of Department risk management maturity. Identify and assess tail risk scenarios, namely the low likelihood, extreme impact loss events, and determine the appropriate mitigations and controls to prevent catastrophic losses.

Quantitative Risk Analysis

- Begin basic quantitative risk modeling focused on wildfire and emergency-related risks to support decision-making.

ERM Integration in Planning

- Aligning with various principles of ISO 31000, work to embed ERM into asset management, investment prioritization, planning, budgeting, and capital project prioritization processes to boost long-term value of mitigation programs

Wildfire Risk Governance

- Mature wildfire risk governance through expanded analytics, cross-agency coordination efforts, and knowledge sharing. Conduct thought-provoking exercises to strive for a best-in-class sustainable risk management program.

5.2 Risk Management Strategy and Tools

Since updating or improving a utility's risk management strategy can be a complex task, LADWP utilized the expertise of an industry-renowned consulting firm to further develop LADWP's Enterprise Risk Management (ERM) and Wildfire Safety Risk Governance programs, including subsequent updates to the wildfire risk management program. Both the ERM and

wildfire risk management programs, inspired by International Standards Organization (ISO) 31000 Risk Management principles, align with the following six (6) principles:

1. **Risk Identification**
2. **Risk Assessment**
3. **Risk Mitigation**
4. **Risk Control**
5. **Risk Reporting**
6. **Risk Monitoring**

These principles are demonstrated in various subsequent sections of this report.

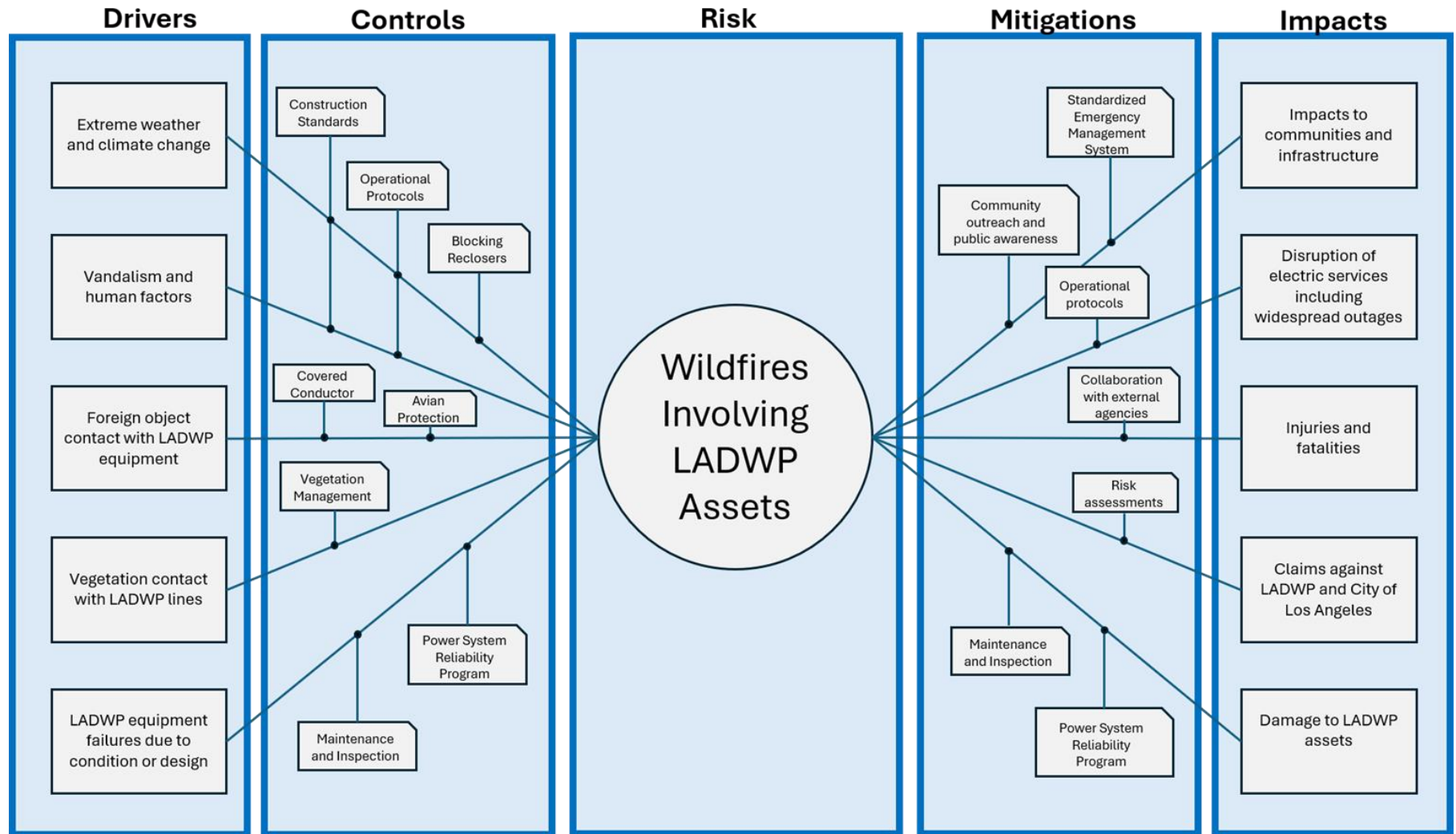
5.3 Wildfire Risk Identification – Principle 1 of 6

Risk identification is the foundational step in developing any risk management program. LADWP risk identification is a systematic process of recognizing and cataloging potential threats, or *drivers* and *triggers*, that could impact LADWP objectives. ISO 31000 defines risk as the effect of uncertainty on objectives. To assess uncertainty, LADWP uses the *likelihood* of a risk event or a suitable proxy measure, such as frequency of occurrence. In the case of wildfire risk identification, risks and risk drivers associated with design, construction, operation, and maintenance are determined, along with risks and risk drivers associated with topographic and climatological risk factors.

LADWP continues to use an established risk management tool, the bowtie diagram, in its wildfire risk mitigation program. The bowtie diagram is a simple method to visualize LADWP's wildfire risk assessment that provides a clear, visual representation of critical risk management components. The bowtie helps to identify measures that aid in prevention or recovery from a wildfire hazard and associates these measures with specific risks or impacts. LADWP's current wildfire risk bowtie is shown below in Figure 5-1.

Table 5-1 shows LADWP's non-exhaustive identified potential risk drivers and potential risk consequences.

Figure 5-1: LADWP Wildfire Risk Bowtie



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

Overhead electric power lines can be vulnerable to disruption from dislodged vegetation in high winds. Steep terrain, mountain passes, or open desert areas can drive the risk of transmission disruption and further exacerbate high wind conditions.

LADWP regularly surveys its service territory during its vegetation management and inspection and maintenance activities to determine wildfire risks and associated risk drivers.

Table 5-1: Risk Drivers and Risk Consequences

Potential Risk Drivers	Potential Risk Consequences*
High Wind Event	- Costly, incremental operational procedures needed for field and office personnel to prepare for and operate during high wind event(s) - Unplanned power outages with potential for long durations due to damage restoration and expanded pre-restoration wildfire safety patrols - Wildfires potentially caused by LADWP or other means and affecting LADWP customers - Increased customer claims resulting from outage or wildfire damages - Long-term increased administrative and regulatory requirements needed to design, engineer, and construct fire-resilient infrastructure
Vegetation Contact	
Conductor Failure	
Conductor Slap	
Pole/Hardware Failure	
Aging Infrastructure	

* Mitigation and control measures are discussed in their respective proceeding sections

Additional risk drivers such as human activity, wildlife contact, and mylar/metallic balloon contacts will be tracked and monitored to determine whether new mitigation activities are warranted. The mitigation measures implemented as part of the WMP are designed to reduce widespread service interruptions, property damage, community impact, equipment damage, and injuries or fatalities due to wildfires.

LADWP's implemented solutions, coupled with its:

- Rigorous construction standards in high fire threat areas, discussed in Section 7.1, "Design, Construction, and Infrastructure,"
- Robust vegetation management program, discussed in Section 6.4, "Vegetation Management Programs – Power System," and
- Collaboration with fire agencies, discussed in Section 2.6, "Office of Emergency Management (OEM)"

help reduce the wildfire risk posed by the utility's overhead electrical lines and equipment.

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

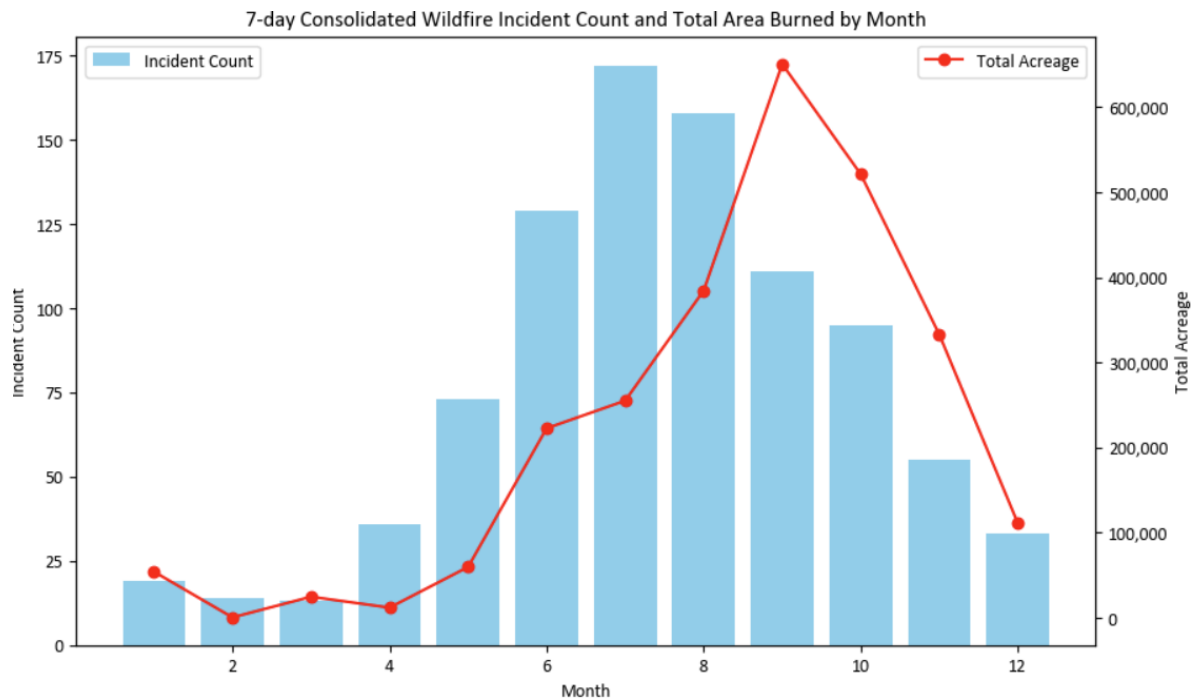
According to the National Oceanic and Atmospheric Administration (NOAA), climate change, including increased heat and extended drought, has been a key driver in increasing the risk and extent of wildfires in California.

The terrain, climate, and vegetation present in Southern California can exacerbate the risk of wildfire in areas near or around LADWP facilities and other structures, such as towers. Hot summers with no rain and low humidity can create long periods of high fire danger. Review of historical fire incident data may also provide insights into these processes affecting wildfires.

The following figure illustrates the monthly distribution of wildfire incidents and total acreage burned in Los Angeles County from 1950 to 2023¹¹. Fire incidents occurring within seven calendar days are combined into one incident count. The data indicates the highest number of incidents typically occur during the summer months, when hot and dry conditions prevail. In contrast, the largest total acreage peaks are usually observed in the fall, when these conditions are compounded by high winds. The divergence between peak fire incidents in summer and peak burned acreage in fall highlights distinct seasonal drivers of wildfire risk. While summer conditions promote ignition, the combination of dry fuels and high winds in fall contributes to larger, more destructive fires. This distinction is important for LADWP, as it suggests that prevention and mitigation strategies should differ between summer and fall.

¹¹ California Department of Forestry & Fire Protection, "Historical Fire Perimeters," 2025. [Online] Available: <https://www.fire.ca.gov/what-we-do/fire-resource-assessment-program/fire-perimeters>. [Accessed 14 March 2025]

Figure 5-2: 7-day Consolidated Wildfire Incident Count and Total Area Burned by Month



LADWP regularly surveys its service territory during its vegetation management and equipment inspection and maintenance activities to evaluate topographical and climatological risks. The main factors considered are as follows:

- The terrain and the accessibility for first responders to react to an incident
- Vegetation type and density
- Extended drought conditions
- Current weather conditions
- Changing weather patterns (climate change)

The potential of frequent, extreme drought exists throughout California. Between 2012 and 2016, California suffered one of the worst droughts in recorded history. This record was surpassed between early 2020 and late 2022 when California again suffered a severe drought. Critically dry conditions marked the three years of the 2020-22 drought as the three driest years ever recorded in California. The City is heavily dependent on supplies that originate from the Sierra Nevada Mountains and was severely impacted by these critically dry conditions, especially in 2022. After experiencing a third consecutive dry year in 2022, the California Department of Water Resources (DWR) reduced its State Water Project (SWP) allocation of requested supplies to five percent. The five percent allocation was insufficient to meet projected demands of the Metropolitan Water District of Southern California (Metropolitan), from whom the City purchases supplies; as a result, Metropolitan borrowed limited additional supplies for unmet critical health and

safety needs. LADWP continues to collaborate with Metropolitan and neighboring water agencies to improve water supply availability and delivery. In the past, LADWP conducted risk assessments to evaluate the risks posed by climate change to LADWP and identified that prolonged or extreme droughts can lead to increased wildfire risks.

5.4 Wildfire Risk Assessment – Principle 2 of 6

To help ensure that WMP objectives can be met, LADWP considered wildfire risks and their respective drivers when developing and updating the WMP. LADWP understands and manages the level of exposure to these risks, which could impact the WMP's objectives of reducing ignition sources, improving the resiliency of the electric grid, enhancing efficiency, and improving programs and protocols.

Various policies, programs, standards, and procedures have been implemented to help ensure the mitigation of wildfire risks and their associated drivers. LADWP has historically implemented efforts to reduce risks and prevent wildfires and the WMP will leverage such historical efforts as well as ongoing, new, and future improvements or considerations.

5.4.1 Service Territory – Assets in Fire Threat Zones

LADWP serves a population of over 4 million residents, with approximately 1.6 million customers in the City and 5,000 customers in the Owens Valley. 152,569 of those customers are within the Tier 2 Fire Threat District and 5,583 customers are within the Tier 3 Fire Threat District. The City covers 478 square miles consisting mostly of urban environment. The high fire threat areas in the City are the eastern end of the Santa Monica Mountains, a portion of the Verdugo Mountains, and small areas located on the outer edges of the City.

The Owens Valley service territory is located in east-central California, between the Sierra Nevada Mountains on the west and the White Mountains on the east, and totals 1,839 square miles. The high fire threat areas in the Owens Valley include sections between the Sierra Nevada Mountains and U.S. Route 395.

To deliver energy from generating plants to its customers, LADWP owns or operates a network of transmission lines. As the Operating Agent of the Pacific DC Intertie, the Southern Transmission System, the Mead-Adelanto Transmission Project and certain Navajo-McCullough transmission facilities, LADWP transmits energy for the co-owners of, or participants in, these facilities. LADWP's transmission lines traverse the state of California on steel lattice transmission towers.

LADWP solely or jointly owns 4,081 miles of overhead transmission lines, their respective transmission towers, and 136 miles of underground transmission cable located within and outside of its service territory.

LADWP solely or jointly owns 281,544 poles, 6,525 miles of overhead and 3,885 miles of underground distribution lines located within and outside of its service territory. Tables 5-

2 and 5-3 below show the numbers and percentages of LADWP's distribution and transmission assets located in the various fire threat zones within the City and Owens Valley service territories.

Of LADWP's total service territory, approximately 13.4% of LADWP's overhead distribution circuit miles are within the Tier 2 Fire Threat District and 0.5% are within the Tier 3 Fire Threat District. Of LADWP's total overhead transmission circuit miles, approximately 6.5% are located in the Tier 2 Fire Threat District and 8.6% are located within the Tier 3 Fire Threat District. These values can be seen below in Table 5-4. LADWP Fire Threat Maps are provided in Appendix B, "LADWP Fire Threat Maps."

5.4.2 Risk Assessment Conducted by Primary Insurer

LADWP's insurance and risk finance section – also known as the *risk control and risk transfer* functions, is housed within the Financial Services Organization within the Office of the Treasurer, Finance and Risk Control section and primarily focuses on the procurement and development of the Department's insurance program that includes coverage for liability, property, and other financial exposures. This area of risk management also ensures compliance with LADWP insurance requirements by vendors, contractors, and permit holders. This group manages the third-party insurance compliance system—which requires third parties to submit evidence of coverage, endorsements (e.g., additional insured, waiver of subrogation), and other policy documentation; maintains standardized insurance forms and reviews each policy submission to confirm contract-specific insurance compliance.

The insurance and risk finance group manages wildfire risk with the purchase of specific wildfire insurance through the blending of commercial insurance policies, wildfire catastrophe (CAT) bonds, and self-insurance mechanisms including captives; rigorously marketing and sharing "LADWP's story" in the current volatile wildfire insurance market; and evaluating strategic coverage and alternative risk solutions—in order to establish robust, sophisticated long-term risk protection while staying within the boundaries of Board approved financial limits.

Every five years, LADWP's primary insurer conducts a risk assessment of LADWP's electric operations. These assessments evaluate various aspects of LADWP's electric operations, including transmission and distribution design, construction standards, inspection schedules, vegetation management, public safety and awareness, and wildfire mitigation. LADWP's primary insurer made no findings in its most recent assessment of LADWP's transmission and distribution design, construction and inspections, vegetation management, and Wildfire Mitigation Plan and wildfire mitigation activities.

Table 5-2: Assets in Fire Threat Zones - Within City of Los Angeles Service Territory

Assets in Fire Threat Zones - Within City of Los Angeles Service Territory					
	Asset	CPUC Tier 3	CPUC Tier 2	LAFD High Fire Risk Zone (Outside of Tier 2 and Tier 3)	LADWP Total
Distribution	Poles	1,166	39,526	6,749	281,544
		0.4%	14.0%	2.4%	
	Circuit Miles	23	816	165	6,525
		0.4%	12.5%	2.5%	
Transmission	Towers	8	119	58	15,452
		< 0.1%	0.8%	0.4%	
	Circuit Miles	2	40	10	4,081
		< 0.1%	1.0%	0.3%	

Table 5-3: Assets in Fire Threat Zones - Within Owens Valley Service Territory

Assets in Fire Threat Zones - Within Owens Valley Service Territory					
	Asset	CPUC Tier 3	CPUC Tier 2	LAFD High Fire Risk Zone	LADWP Total
Distribution	Poles	NONE	1,831	N/A	281,544
			0.7%		
	Circuit Miles		63		6,525
			1.0%		
Transmission	Towers	NONE	251	N/A	15,452
			1.6%		
	Circuit Miles		52		4,081
			1.3%		

Table 5-4: Percentage of Circuit Miles in Fire Threat Zones

Percentage of Circuit Miles in Fire Threat Zones		
	Tier 2	Tier 3
% of Overhead Distribution Circuit Miles	13.4%	0.5%
% of Overhead Transmission Circuit Miles	6.5%	8.6%

5.4.3 Risk Modeling

LADWP's inaugural Enterprise Risk Management organization is continuing to expand its organization, including a subdivision dedicated to leading the delivery of quantitative wildfire risk assessments. In the near-term, given the current maturity state of LADWP's risk data, risk model, and risk-based operations, planning organizations are highly dependent on matured reliability-driven programs such as PSRP to execute wildfire infrastructure improvements. Meanwhile, LADWP is working urgently to execute various technology investments that leverage Artificial Intelligence (AI), advanced mapping tools, fire science, etc., as described further in section 6.2.5 of this report. As it may take several years to fully mature risk-based decision-making driven by these tools and technologies, LADWP is exploring the use of semi-quantitative risk measures to help risk-rank assets in fire threat areas.

Value-Based Considerations

- **Short-Term:** When evaluating the effectiveness of wildfire mitigation measures, LADWP considers using **benefit-cost ratios (BCR)**, where measurable, to estimate the short-term value of a proposed mitigation. A higher BCR, interpreted on a scale where 1.0 indicates a break-even return and values greater than 1.0 indicate a positive return on investment, can suggest that a mitigation provides more immediate value to customers. LADWP recognizes that this type of assessment has limitations, because BCRs do not fully capture all community interests, particularly long-term affordability. For example, substantial near-term capital investment may place cost burdens on future customers, which is an issue LADWP considers critically important. As a result, short-term valuation may tend to favor lower-cost, moderate-impact strategies, such as protective equipment device settings (PEDS), even when those strategies may not align with longer-term community needs or resilience objectives.
- **Long-Term:** To complement the insights of short-term valuation, LADWP is also considering long-term mitigation effectiveness, measured as the **Total Cost of Ownership**. This cost, if measurable, may indicate an all-inclusive book cost of an asset, including maintenance activities and lifetime loss exposure. The lowest cost of ownership for all prospective mitigations may suggest a more universally

complete value to consumers. LADWP acknowledges limitations with this assessment, as long-term valuation may tend to suggest higher upfront cost mitigations that maximize risk reduction, such as overhead to underground conversions, are most viable.

Risk Tolerance

- To complement the above value-based considerations, LADWP is considering the use of **Time to Construct** as a proxy that represents risk tolerance (and intolerance). For example, if a prospective mitigation, such as an overhead-to-underground conversion, is estimated to require more than 10 years to construct, this duration may indicate an intolerable period of risk exposure for the assets that remain unmitigated. Therefore, a more agile and deployable mitigation must be considered.

In the mid-to long-term, LADWP aims to fully operationalize the use of advanced modeling tools for risk-based asset planning as well as for operational risk management. To set up a proper pathway to achieving this, LADWP is currently developing a foundational data system for wildfire risk. This data system will establish a single database view that incorporates key data from multiple key resources such as asset failure data, associated reliability data, digitized vegetation data, meteorology data – namely, wind speed, wind gusts, relative humidity, live fuel moisture, dead fuel moisture, and other conditions; geographical information, etc. Electric asset failure data will also be enhanced with additional robustness to help inform asset ignition risk.

6.0 Wildfire Risk Control Programs

LADWP prioritizes four key programs that are fundamental to preventive risk control efforts. A *risk control* is a currently established measure that is modifying risk. In general, these programs are actively maintaining current risk exposures or limiting risk growth within a natural risk tolerance. This section further elaborates these measures, which represent Principle 4 of 6. Note that Principle 3 of 6, *risk mitigations*, is described in Section 7.0.



6.1 Inspection and Maintenance Program – Power System

The objective of the LADWP Power System Inspection and Maintenance Program is to promote the safe and reliable operation of LADWP's transmission and distribution system by inspecting and maintaining transmission and distribution assets.

6.1.1 Inspection Requirements and Frequency

LADWP's inspection cycle is intended to comply with the inspection requirements provided in CPUC GO 165 and CPUC GO 95, Rule 18. LADWP's practice is to patrol the overhead power distribution system once a year. In designated wildfire risk areas, patrols usually take place between March and April, which helps to identify and address concerns for the traditional ensuing fall-winter fire season. Seasonal weather anomalies, such as the heavy El Nino season projected in 2026, may modify operational plans.

In accordance with GO 165 requirements, LADWP conducts its detailed inspection cycles every 5 years in its service territory and intrusively inspects wood poles after 20 years of service. If a pole passes intrusive inspection, it will be scheduled for another intrusive inspection every 10 years thereafter. LADWP staff uses knowledge of the specific environmental conditions to determine when areas inside of the HFTD require more frequent inspections or proactive equipment replacement. This may require adjusting inspection schedules based on seasonal wildfire risk indications and specific environmental patterns.

6.1.2 Types of Inspections

The types of inspections activities are summarized below:

- Patrol Inspections: refers to visual, non-invasive inspections where staff identify obvious safety and maintenance issues.
- Aerial Inspection: LADWP abides by and satisfies the WECC requirement of one patrol per calendar year with no more than 18 calendar months between inspections

on the same right-of-way by performing aerial patrols of its transmission lines semiannually. As aerial patrols can be limited due to weather, aircraft availability, and construction projects, LADWP aims to perform aerial patrols at least once during the first half of the year and at least once during the second half of the year, with at least 3 months between intervals. These patrols include a visual inspection of towers, fixtures, conductors and related hardware, insulators, and overhead ground wires. Attention is also given to right of way conditions, encroachments, and vegetation issues.

- Detailed Inspections: refers to full evaluations of distribution facility equipment, where staff assess the conditions of poles, conductor lines, transformers, fuses, insulators, and other assets. Crews can also make on-the-spot repairs for certain issues identified during the inspection process.
- Intrusive Pole Inspections: refers to evaluation of the structural integrity of the distribution system's utility poles. For wood poles, inspection staff probe the utility poles to test for signs of decay or other factors which indicate that a pole requires maintenance, reinforcement, or replacement.
- Infrared Inspections: refers to use of heat sensing infrared cameras to detect "hot spots" which cannot be seen by the human eye. Hot spots can indicate potential failure points, such as bad connections or failing components.

6.1.3 Post-Inspection Activities

Repair and maintenance work identified during inspections is prioritized based on the level of risk posed and the location of the asset. Work associated with immediate safety or reliability risks, as well as tasks or assignments within the Tier 2 and Tier 3 HFTDs, are given the highest priority and remediated as soon as practicable.

Once repairs are made, a supervisor will inspect them for quality control, helping to ensure the repairs are completed per LADWP's construction standards. Furthermore, if LADWP staff discover a facility in need of repair that is not owned by LADWP but is installed on LADWP's pole, LADWP will issue a notice to the facility owner.

LADWP will annually review the results from inspections and adjust, if necessary, to address the risk of wildfire due to its electrical lines.

6.1.4 Distribution Line Pole Inspection and Maintenance – Principles 5 and 6

In May 2023, the LADWP Board adopted Resolution 23222 for distribution line pole inspection and maintenance. The motion called for quarterly and annual reporting on various aspects of distribution line pole inspection, maintenance, and compliance.

Since the adoption of Resolution 23222, LADWP has provided its Board of Commissioners with quarterly year-to-date reports on distribution asset inspection statistics, and an accounting of completed and outstanding fix-it tickets. These reports allow LADWP and its Board to better track progress on fix-it tickets and Inspection Maintenance Accelerated Codes (IMACs).

This serves as one example of how LADWP works to prudently deliver Principle 5 – Risk Reporting and Principle 6 – Risk Monitoring.

6.1.5 Transmission Line and Tower Inspection and Maintenance

LADWP also inspects and maintains its transmission lines and towers per its internal procedures, such as its Transmission Inspection Maintenance Plan. That plan's purpose is to:

- Help ensure the safe and reliable operation of the Department's bulk transmission system
- Describe in a single document the maintenance and inspection criteria and activities for certain LADWP lines, as identified by the Western Electricity Coordinating Council (WECC), "taking into consideration diverse environmental and climatic conditions, terrain, equipment, maintenance philosophies, and design practices"
- Maintain compliance with WECC Standard FAC-501-WECC, Transmission Maintenance, as approved by the Federal Energy Regulatory Commission on May 30, 2018

LADWP performs aerial patrols of its transmission lines semiannually (at least once during the first half of the year and at least once during the second half of the year, with at least 3 months between intervals).

These aerial patrols are conducted to identify and quantify right-of-way encroachments, construction, conductor damage, insulator breakage, earth movement, or any other conditions which may impact transmission system right-of-way property or facilities. The patrols include a visual inspection of towers, fixtures, conductors and related hardware, insulators, and overhead ground wires. Attention is also given to right-of-way conditions, encroachments, and vegetation issues.

LADWP conducts inspections on its transmission towers in an orderly and systematic manner, starting with the tower site and progressing up the tower to the static peak, circling the tower at each level bar (where feasible) to assure 360-degree coverage. Tower bolts are spot checked and set to the required specifications. Special attention is given to bolts at splice points, arm supports, and conductor attachment points. Once completed, reportable conditions are entered in a transmission maintenance database.

LADWP also conducts maintenance on its transmission towers via contamination control (insulator washing) and tower and wood pole structure management. Contamination control is achieved by using truck-mounted nozzle washers and climbing hand-wash methods. All insulator washing is performed with the application of high-pressure de-mineralized water. Intrusive inspections of wood poles are performed in accordance with GO 95.

For transmission towers that cross other lines, freeways, major highways, railroads, or bodies of water, LADWP's practice is to complete a detailed climbing inspection annually. All other towers are inspected at least once every ten years. Other forms of

inspections include patrols by air or ground due to reports of trouble, line relays, or following an extended planned outage.

As a result of inspection findings or as otherwise reported by field personnel, wildfire-related defects such as corroded connectors, deteriorated insulators, and foreign objects, etc. on transmission infrastructure are reported to the appropriate workgroup for reasonably urgent remediation. Existing work practices dictate that remediations are facilitated in a triaged manner consistent with GO 95 Rule 18. Urgent matters, such as foreign objects, are removed immediately or as soon as practical.

6.1.6 Enhanced Maintenance Activities

LADWP is evaluating shifting maintenance from traditional, reactive practices to proactive, predictive, and data-driven maintenance through a wide set of emerging technologies and analytics tools. Enhancement opportunities vary on a broad spectrum, including real-time data, automation, AI-driven insights, and continuous infrastructure condition monitoring—enabling faster detection, more targeted interventions, and long-term resilience improvements. Please see section 6.2.5 “Additional Wildfire Mitigation and System Hardening Efforts” below for additional information.

6.2 Power System Reliability Program (PSRP)

In July 2014, the Power Reliability Program (PRP), which started in 2007 with a focus on improving the distribution system, evolved into the PSRP. The PSRP helps prioritize asset maintenance and capital work for each major section of the Power System, including generation, transmission, substation, and distribution.

6.2.1 PSRP Goals

The PSRP is a comprehensive, long-term power reliability program with the following goals:

- Mitigate risk for circuits and stations with higher frequency issues based on the types of outages and equipment failures specific to the facility
- Expedite restoring temporary repairs of equipment failures and target circuits that pose reliability issues
- Commit to proactive maintenance and effective capital improvements
- Achieve replacement cycles that align with the assets’ respective life cycles, including replacement of overloaded distribution transformers, worn underground cables, deteriorated overhead poles, and fatigued substation equipment

The PSRP identifies replacement goals for specific assets by fiscal year. PSRP targets are expected to be updated on a fiscal-year basis to adjust to varying Power System conditions and resource allocations.

As a part of these goals, LADWP strives to inspect, maintain, and upgrade assets located in the HFTDs in accordance with CPUC’s GO 95, Rule 18. Relative to its urban-

dense service territory, few LADWP distribution assets are located within HFTDs. LADWP continues to inspect and replace assets in these High Fire Threat Districts to harden its infrastructure and mitigate wildfire risks.

In 2026, in collaboration between Enterprise Risk and the newly developed divisions – *Power Asset Management Office* and *Power Project Management Office*, LADWP began developing a risk framework to prioritize infrastructure upgrades using risk-based criteria and engineering assessments. This data-driven framework may prioritize upgrades and replacements based on asset condition and criticality, exposure to specific hazards, historical outage and ignition data, and proximity to critical facilities or communities. The framework will (1) integrate wildfire risk considerations into engineering design reviews and project scoping, (2) use GIS overlays, inspection data, and outage history to identify and prioritize high-risk assets, and (3) develop standardized tools and templates to support consistent application of prioritization criteria.

This framework can be used to address specific wildfire risk considerations, which may require design, engineering, construction, and risk management expert resources beyond those available to PSRP.

6.2.2 PSRP Budget

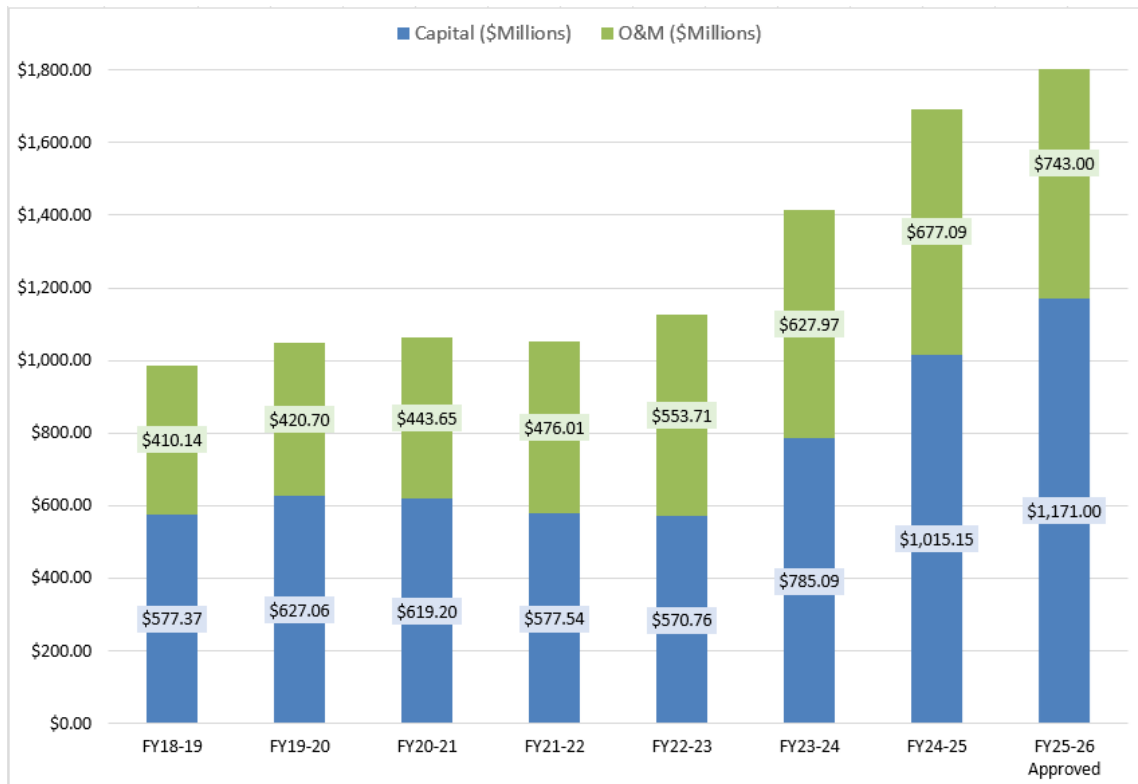
LADWP is investing heavily in its PSRP to promote a robust, reliable, and safe Power System through the replacement of infrastructure assets related to its transmission and distribution system that are reaching the end of their useful lives.

LADWP has planned the PSRP budget to support the following key objectives:

- Gradually increase investments to address the backlog of asset inspection/maintenance and capital improvement work
- Systematically invest in current and future projects that have the greatest potential to improve LADWP's reliability
- Increase investments to achieve replacement cycles that align with the assets' respective life cycles
- Invest in the training and resources needed to help ensure LADWP's capability to maintain higher reliability

Evidence of LADWP's strong commitment to the PSRP is provided below in Figure 6-1, which shows PSRP historical and approved O&M and capital funding from Fiscal Year 2018-2019 through Fiscal Year 2025-2026.

Figure 6-1: Historical and Approved O&M and Capital Funding



The breakdown of PSRP actual expenditures from Fiscal Year 2016-2017 through Fiscal Year 2023-2024 is provided in Appendix C, “Breakdowns of PSRP Budget Actuals (FY 2016-17 through FY 2023-24).” In Fiscal Year 2023-2024, LADWP has spent over \$123M of its PSRP budget to strengthen its grid by replacing poles, crossarms, transformers, and conductors.

PSRP expenditures are expected to ramp up to the approved FY 2026-2027 budget of \$2.39 billion. This is to allow LADWP to achieve the preferred replacement cycle for all its major assets within generation, transmission, substation, and distribution.

6.2.3 PSRP Metrics

The tables and figures shown in Appendix D, “LADWP Metrics,” provide PSRP metrics and PSRP-related data, including fire threat zone information. These tables and figures depict the most recent information collected by LADWP’s Work Management Information System (WMIS) and GIS groups and are subject to modification based on actual completion of on-going field work.

The replacements of assets in HFTDs are constructed using the standards that are developed for High Wind and Fire areas. These replacement metrics can be seen in

Section 10.0, “Metrics, Monitoring and Continuous Improvement,” and Appendix D, “LADWP Metrics.”

6.2.4 Substation-Automation System (SAS)

Upgrading legacy substations in HFTDs with modern automation systems is a critical component of LADWP’s wildfire-mitigation strategy. A substation-automation system (SASs) provides real-time visibility, remote control, and advanced fault-detection capabilities that may improve operational response during wildfire events. This focus area also supports broader grid-modernization efforts, including Distribution Automation (DA), laying the foundation for other resiliency initiatives. Key actions include:

- Prioritize SAS deployment in Tier 2 and Tier 3 HFTDs, where delays related to manual switching could impact the response time to implement a mitigation action.
- Enable remote operation of switches and reclosers to improve sectionalizing speed, add operational flexibility, and reduce the need for field dispatch.
- Provide LADWP with real-time equipment status, fault data, and remote fault-isolation capabilities.
- Support integration with predictive analytics and weather data to enhance situational awareness and preemptive response.
- Replace older protection and control systems with intelligent electronic devices (IEDs) to improve reliability and reduce outage durations.

6.2.5 Additional Wildfire Mitigation and System Hardening Efforts

LADWP continues to advance a comprehensive and technology-driven wildfire mitigation strategy focused on improving public safety, operational resiliency, situational awareness, and system reliability across its service territory and HFTD areas. Through the Power System Technology and Innovation (PSTI) and the Wildfire Technology and Innovation Subcommittee, LADWP is evaluating, piloting, and deploying emerging technologies designed to strengthen the Department’s ability to detect, predict, prevent, respond to, and mitigate wildfire-related risks impacting electric infrastructure and surrounding communities.

As part of this initiative, LADWP has implemented a multi-layered wildfire technology strategy that combines advanced wildfire intelligence platforms, artificial intelligence (AI), predictive analytics, remote sensing, field sensors, autonomous systems, and digital infrastructure modeling capabilities. These efforts are intended to promote a proactive and predictive risk management framework supported by real-time operational intelligence and advanced analytics.

LADWP has also significantly expanded deployment of advanced wildfire situational awareness infrastructure throughout HFTD areas, including high-definition pan-tilt-zoom (PTZ) wildfire cameras, thermal imaging capabilities, AI-enabled smoke and anomaly

detection analytics, edge-computing communication systems, solar-powered remote monitoring platforms, and integrated weather intelligence stations. The weather monitoring systems collect and transmit critical environmental data including:

- Wind speed and wind direction;
- Ambient temperature;
- Relative humidity;
- Barometric pressure;
- Rainfall and precipitation data;
- Fuel moisture-related environmental conditions; and
- Real-time localized weather conditions supporting wildfire risk analytics and operational decision-making.

These camera and weather station deployments support:

- Early wildfire detection;
- Real-time situational awareness;
- Fire weather monitoring;
- Operational coordination during red flag and extreme weather conditions;
- Improved emergency response capabilities; and
- Enhanced operational decision-making for field crews and system operators.

In parallel with these deployments, LADWP is evaluating and piloting technologies capable of:

- Real-time wildfire detection and predictive fire spread modeling;
- AI-driven wildfire risk forecasting and operational decision support;
- Satellite, aerial, and remote sensing analytics for vegetation encroachment and infrastructure exposure assessments;
- Detection of conductor faults, broken conductors, arcing events, equipment anomalies, and potential ignition sources;
- Continuous monitoring of transmission and distribution infrastructure health and operational conditions;
- Structural analysis and digital modeling of transmission assets to assess wildfire exposure, infrastructure vulnerability, and resiliency under extreme weather conditions;
- Computer vision and automated image analytics for defect identification and asset condition assessment;
- LiDAR and advanced vegetation management analytics to improve clearance monitoring and vegetation risk prioritization;
- Integration of weather data, cameras, sensors, AI analytics, and operational systems into centralized situational awareness platforms; and

- Predictive and condition-based maintenance strategies for critical grid infrastructure.

LADWP's wildfire mitigation strategy also includes pilot studies and operational evaluations designed to validate the technical performance, scalability, cybersecurity, interoperability, operational integration, and cost effectiveness of emerging technologies prior to broader system deployment. These pilot programs allow LADWP to evaluate technologies under real-world operating conditions within LADWP's transmission and distribution environments while reducing implementation risk and supporting data-driven investment decisions.

In addition, LADWP is actively collaborating with local universities, engineering faculty, graduate researchers, national laboratories, utilities, and industry partners to accelerate innovation associated with wildfire mitigation, autonomous inspection systems, artificial intelligence, machine learning, predictive maintenance, and grid resiliency. These collaborations provide LADWP access to advanced research capabilities, emerging engineering talent, academic expertise, and specialized analytical tools while fostering the development of next-generation technologies applicable to utility operations and public safety.

Collectively, these technology deployments, pilot studies, operational evaluations, and research collaborations strengthen LADWP's ability to improve wildfire detection, reduce ignition risk, enhance operational response capabilities, support firefighter and public safety coordination, improve infrastructure resiliency, and advance long-term wildfire mitigation objectives throughout LADWP's service territory and HFTD areas.

6.3 Quality Management Program – Power and Water Systems

One of the primary objectives of LADWP's Quality Management Program is to provide a structured framework that defines and documents processes, procedures, and responsibilities for reducing enterprise-wide risks, including wildfire mitigation risks, and for achieving quality goals and practices as established in the WMP and by applicable industry standards.

Currently, LADWP is evaluating alignment of its forthcoming Quality Management System (QMS) with the International Organization for Standardization (ISO) *ISO 9001:2015 Quality management systems - Requirements*, a globally recognized standard for quality management, and *Juran's Quality Handbook – The Complete Guide To Performance Excellence*, an industry-recognized roadmap for determining where an organization is in the process and what needs to be done to reach the next level.

Although the LADWP enterprise QMS is in the initial planning stage of development, a variety of established LADWP practices, such as quality control measures for vegetation management, continue to support quality in critical areas throughout the organization. As presented in Section 1.5, "Forward-Looking Blueprint," LADWP intends to champion the development and implementation of its enterprise QMS.

6.3.1 Quality Assurance

The American Society of Quality (ASQ) defines quality assurance as “*part of quality management focused on providing confidence that quality requirements will be fulfilled.*” This confidence has an internal component for management and an external component for customers and regulators. Both components will be addressed during the development of LADWP’s enterprise QMS.

6.3.2 Quality Control

ASQ also defines quality control as “*part of quality management focused on fulfilling quality requirements.*” Where quality assurance relates to confidence about how a process is performed, quality control is more the inspection aspect of quality management.

LADWP currently has certain established quality control practices in both vegetation management and inspection and maintenance. Examples include (1) quality control of vegetation work being overseen by LADWP’s trimming coordinators and superintendents and (2) quality control of repair work to help ensure that repairs are completed per LADWP’s construction standards.

LADWP intends to add programmatic structure to existing and new quality control practices through the development and use of procedures and/or documented processes, qualification requirements, follow-up activities, etc.

**215,000 TREES
TRIMMED PER YEAR**

6.3.3 Quality Auditing

A quality audit is a structured, independent process that is used to determine if the audited activity (i.e., project, program, etc.) complies with the policies, procedures, and other requirements of the audited activity. Audits may be conducted by either internal or external parties. Those conducted internally will follow the direction and guidelines prescribed under the forthcoming enterprise QMS. LADWP intends to champion the development and implementation of its enterprise quality auditing program.

6.4 Vegetation Management Programs – Power System

The objective of LADWP’s Power System Vegetation Management group is to help ensure the safe and reliable operation of LADWP’s transmission and distribution system by reducing vegetation-caused outages and reducing the risk that vegetation impact could ignite a fire. To meet this objective, the Vegetation Management group is responsible for both the Transmission Vegetation Management Program (TVMP) and the Line Clearance Tree Trimming Program.

6.4.1 Requirements and Standards

LADWP's practice is to meet the industry standard for vegetation management practices, including North American Reliability Corporation (NERC) standards and requirements such as NERC FAC-003-4, *Transmission Vegetation Management*, where applicable. For both transmission and distribution facilities, LADWP aims to meet the following standards, which require increased clearances in HFTDs:

- California Public Utilities Commission General Order GO 95, *Rules for Overhead Electric Line Construction*, Rule 35
- California Public Utilities Commission General Order GO 95, *Rules for Overhead Electric Line Construction*, Appendix F, "Clearance of Poles, Towers and Structures from Railroad Tracks," Guidelines to Rule 35
- California Code, Public Resources Code (PRC) Section 4292 (PRC § 4292)
- California Code, Public Resources Code (PRC) Section 4293 (PRC § 4293)

LADWP's TVMP and Line Clearance Tree Trimming Program aim to meet all applicable Federal and State mandates. In addition, LADWP follows:

- American National Standards Institute (ANSI) Z133, *Safety Requirements for Arboricultural Operations Manual*
- ANSI A300 *Tree Care Standards* (which is an industry pruning standard)
- International Society of Arboriculture (ISA) *Best Management Practices – Pruning*.

6.4.2 Line Clearance Tree Trimming

LADWP monitors the clearance for approximately 362,000 trees and maintains a tree-type index comprised of 85 tree types. LADWP performs line clearance tree trimming on approximately 215,000 trees per year. Further detail on LADWP's line clearance tree trimming in HFTDs can be seen in Appendix D, *Table D-3: LADWP's Distribution-level Line Clearance Tree Trimming in HFTDs*.

Tree growth varies throughout LADWP's service territory due to differences in microclimates and topography. Vegetation management prescriptions are based on real-time observations by qualified inspection staff. Patrols are driven by the need to help ensure Power System reliability and integrity and to mitigate risk while considering applicable compliance requirements.

LADWP is responsible for vegetation management around the transmission and distribution facilities that it operates and maintains, and, accordingly, trims vegetation to meet required clearances. Private property trees and vegetation are the responsibility of the private property owner.

6.4.3 Patrols and Pruning

LADWP patrols the clearances between conductors and vegetation of its transmission and distribution overhead lines on an approximate 12-month cycle, as well as an

additional mid-cycle patrol targeting fast-growing vegetation, to help mitigate the risk of vegetation encroachments within each conductor's respective clearance distance.

When patrols are performed, the findings are recorded on an inspection form, reported to supervision, and work orders generated when appropriate. When vegetation is identified as posing a potential hazard, arrangements are made to mitigate the hazard, and the vegetation is trimmed or removed.

LADWP strives to implement a pruning cycle of approximately 12 months. Crews visit each neighborhood within the City and its service areas during the cycle. Neighborhoods are broken down into sections which all start and end with the following pruning cycle activities:

- **Pre-Trim Patrol:** Inspection staff inspect the overhead facilities to identify vegetation that may pose a risk of falling into the line or that has encroached into clearances to identify which vegetation needs pruning.
- **Post-Trim Patrol:** Once trimmings are completed, tree supervisors confirm the clearances between vegetation and electric construction, equipment, and facilities.
- LADWP's conductors, mostly in an urban setting, traverse many private properties. LADWP coordinates with owners of these private properties to help ensure the appropriate clearance distances between vegetation and conductors are met. These conductor and vegetation patrols are performed on foot, by car, or by air.

6.4.4 Pruning Practices

LADWP's practices regarding pruning are as follows:

- All pruning shall be in accordance with the minimum clearances as identified in LADWP's TVMP and Line Clearance Tree Trimming Program
- Line sag, wind sway, tree movement from wind, species, type, and anticipated growth rates shall be considered when identifying trees to be pruned or removed and prescribing clearance distances
- The time required to obtain any necessary permission or permits to perform required pruning or removals shall be included when scheduling any vegetation management work and prescribing clearances
- All pruning and removal work shall be performed in accordance with ANSI Z133, ANSI A300 Part 1 and Part 7

6.4.5 Vegetation Removal Practices

LADWP's practices regarding vegetation removal include:

- Trees and vegetation on LADWP-owned parcels shall be removed when deemed necessary by LADWP
- Vegetation which requires frequent pruning shall be removed, whenever possible

- Trees or vegetation that are growing within LADWP's Transmission right of way that are dead, show signs of disease, decay, or ground or root disturbance shall be removed

LADWP chooses “hands on” mechanical line clearance tree trimming, branch removal, tree removal, and brush clearing practices; the amount of trimming will depend on the conductor voltage, construction, tree location, species, and rate of tree growth with the emphasis on compliance, HFTD designation, and other requirements as dictated by GO 95, the TVMP, and the Line Clearance Tree Trimming Program. Quality control of inspections and vegetation work is overseen by LADWP's tree trimming coordinators and superintendents.

6.4.6 Routine Inspections and Notifications Requiring Unplanned Work

LADWP performs annual compliance inspections of every tree with the potential to contact overhead facilities. LADWP performs more frequent and detailed inspections of any such trees, and in cases where “hazard trees” (dead, dying, diseased or leaning) could strike the facilities, crews will work with the landowner to remove the tree or portion of the tree that poses a risk.

If LADWP is notified of vegetation that has either blown into lines or fallen onto its distribution lines, LADWP's Electric Trouble Group will dispatch personnel to mitigate the issues and will notify LADWP's Vegetation Management Group as needed. If vegetation has either blown into or fallen onto LADWP's transmission lines, LADWP's Energy Control Center will notify the Electric Trouble Board, which will then notify the transmission superintendent to resolve the issue. LADWP is exploring the use of emerging and advanced technologies to better assess and track vegetation-associated fire risk.

6.4.7 Qualified Vegetation Management Personnel

LADWP's vegetation management program, overseen by the Transmission Vegetation Program Manager, is responsible for qualified line clearance tree trimmer training, certification, and annual refresher training.

LADWP personnel performing line clearance tree trimming are qualified line clearance tree trimmers and/or Qualified Electrical Workers (QEWs). Additionally, LADWP's in-house Vegetation Management Group is supplemented by vegetation management contractors. LADWP also coordinates as necessary with the County of Los Angeles, Agricultural Commissioner/Weights and Measures Department to perform inspections and brush clearance maintenance for LADWP-owned properties outside the City.

6.4.8 Wildfire Hazard Potential (WHP) Index

LADWP personnel are currently in the process of reviewing information on the WHP, a long-term planning tool used to prioritize wildfire mitigation efforts. Developed by the United States Forest Service (USFS), it incorporates statistical modeling of data on

wildfire likelihood and intensity, the locations of burnable vegetation, and historical ignition locations to assess the relative risk of wildfire at different locations within LADWP's territory.

LADWP is also considering other wildfire risk models. These include estimated decadal fire probability, contributing to California's Fourth Climate Change Assessment. LADWP continues to monitor updates to various wildfire risk models. Cal-Adapt, funded by the California Energy Commission, provides various tools to model wildfire risk for the Fifth Climate Change Assessment. Cal-Adapt is developing additional wildfire risk tools which LADWP will review when available.

By quantifying the relative potential for high-intensity wildfires that may be difficult to manage, the WHP may be used to help prioritize where fuel treatments may be needed. By itself, this index does not explicitly map wildfire threat or risk. However, when the WHP is combined with spatial data depicting highly valued resources and assets (i.e., structures or powerlines), it can approximate a measure of relative risk posed by wildfires to those specific resources and assets.

The WHP could potentially help LADWP's long-term planning efforts, but it is important to also note the index's limitations. Because the WHP does not include any information on current or forecasted weather or fuel moisture conditions, it cannot provide a forecast or wildfire outlook for any season. Instead, the WHP is intended to assist with long-term strategic fuels management only.

LADWP's quantitative risk modeling programs are continuing to evolve, including enhancing how vegetation management data is used to inform wildfire risk models. This is further discussed in section 5.3.

6.5 Vegetation Management Program – Water System

6.5.1 Water System Facilities and Infrastructure

The LADWP Water System owns approximately 7,500 acres of water storage, transmission, and treatment properties in the Los Angeles Metropolitan area. The Water System conducts vegetation management in the Los Angeles Metropolitan area that complies with the Los Angeles Municipal Code 57.4906.5.1. The work is accomplished using LADWP forces and LAFD's Brush Clearance Unit contractors.

In addition to brush clearance activities to protect facilities and infrastructure, Water System oversees and supports other vegetation management efforts as described in the following section.

6.5.2 Water Supply Impacts on Customer Vegetation Management

In response to water supply conditions, the current Emergency Water Conservation Plan, included in Chapter XII of the City of Los Angeles Municipal Code¹², includes limits on the amount of irrigation that customers can perform for their landscapes. During periods of limited irrigation, customers may request exceptions or variances, which include, but are not limited to, hardships associated with brush management if the Los Angeles Fire Department (LAFD) identifies a risk factor in watering only on the designated days of the week. LADWP customers are encouraged to review and comply with the LAFD's brush clearance requirements.

In addition to the variance process explained above, the Emergency Water Conservation Plan also allows for variances related to plant establishment periods, including exemptions for hillside areas impacted by wildfires that have been replanted for erosion control.

For useful tips, LADWP has also published a link to CAL FIRE's Home Hardening online resources on our Turf Replacement Rebate Page¹³ for customers planning to redesign their landscape or manage their vegetation. LADWP is working to develop resources specific to our service area for customers to utilize when planning their projects and are hoping to have these resources available within the next 18 months.

6.5.3 Vegetation-Resistant Infrastructure

Infrastructure design plays a critical role in minimizing vegetation encroachment and associated ignition risks. Key actions include:

- Design infrastructure to minimize vegetation encroachment, including increased clearances and strategic placement of poles and equipment.
- Coordinate infrastructure upgrades with clearance cycles and hazardous tree removal.
- Evaluate the use of remote sensing and other technologies to assess vegetation risk and inform design work. Light Detection and Ranging (LIDAR) options are being considered. LADWP is developing a pilot program, estimated for 2026.

In-person inspections, by LADWP and LAFD personnel, remain the core strategy for vegetation management. To meet LAFD Brush Clearance Requirements, LADWP coordinates with LAFD as necessary to inspect and perform brush clearance maintenance for select LADWP properties within the City.

¹² See Chapter XII The Water Conservation Plan of the City of Los Angeles, Sections 121.08 Water Conservation Phases and 121.09 Unreasonable Use of Water

¹³ Available <https://www.ladwp.com/who-we-are/water-system/water-conservation/turf-replacement-rebate>

7.0 Wildfire Risk Mitigation Strategies

LADWP continually advances its wildfire risk treatment portfolio with new or expanded risk mitigation programs. A risk *mitigation* is a measure or set of measures designed to reduce the likelihood of a risk event occurring or to reduce the consequences if it does occur. In general, these programs aim to enhance existing risk control programs or implement new risk reduction measures. This section further elaborates these measures, which represent Principle 3 of 6. Note that Principle 4 of 6, risk controls, is described in Section 6.0.

7.1 Engineering, Design, and Construction

LADWP is constantly looking to improve and harden its infrastructure by continuously evaluating and updating its policies, processes, methodologies, and construction standards as new technologies emerge.

7.1.1 Existing Requirements and Standards

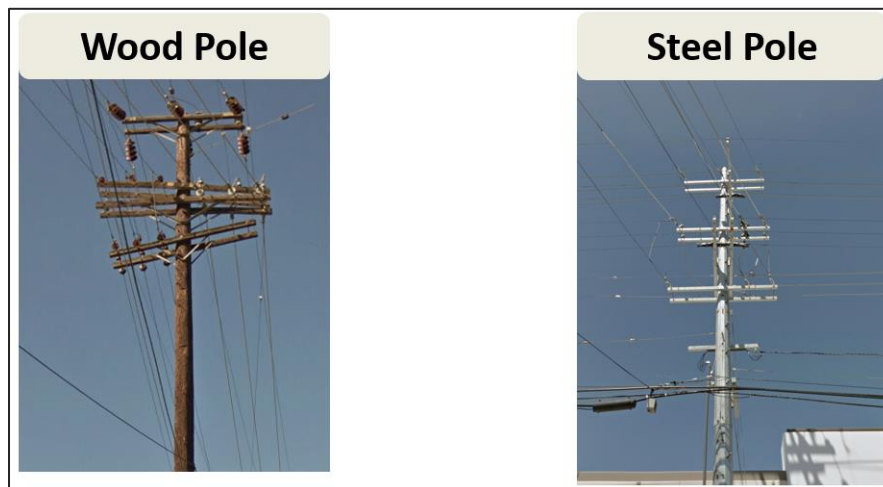
LADWP's electrical equipment and facilities generally are designed and constructed to meet applicable federal, state, or industry standards. LADWP treats California Public Utilities Commission General Order (CPUC GO 95), *Rules for Overhead Electric Line Construction*, as a key industry standard for overhead electrical facilities. LADWP strives to meet and sometimes exceed applicable requirements in GO 95. Additionally, LADWP monitors and follows as appropriate the *National Electrical Safety Code (NESC)*, especially if requirements are more stringent or risk-averse when compared to GO 95.

7.1.2 Updated Construction Standards and Infrastructure Improvements

Starting in 2008, to protect its overhead facilities, LADWP increased its power line construction standards to reduce risks associated with overhead equipment in high wind and designated fire hazard areas. The following design and construction standards may be used to mitigate the risk of wildfire when replacing existing equipment or in new construction:

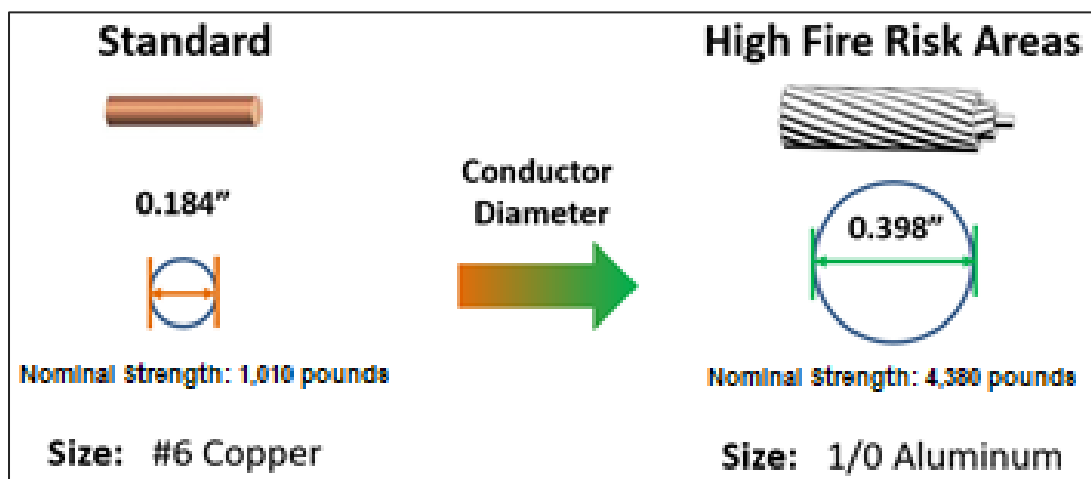
- Where needed to meet loading requirements, installing alternative material poles such as ductile iron, steel, and concrete while maintaining compliance with CPUC GO 95 Safety Factors:
-

Figure 7-1: Pole Material Improvements



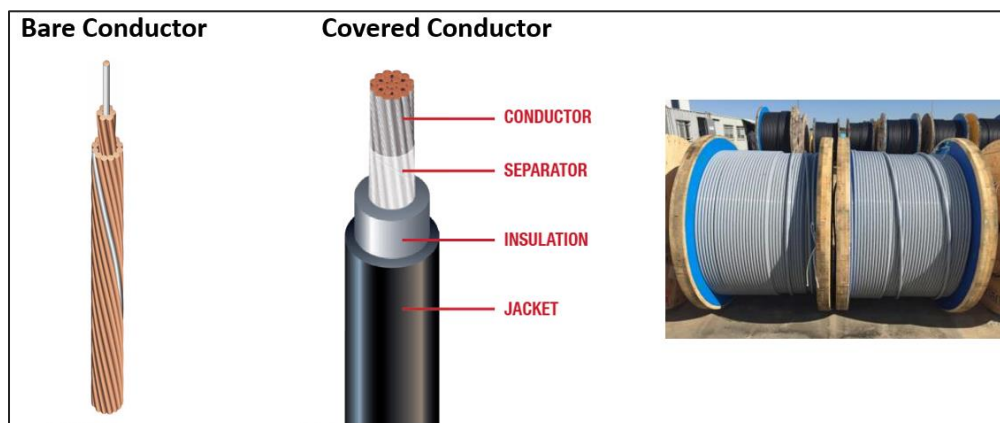
- Using higher-strength conductors and fiberglass crossarms to provide additional resilience:

Figure 7-2: Conductor Selection



- Replacing low voltage bare conductors with insulated conductors to reduce the chance of incidental contact from foreign objects:

Figure 7-3: Upgrade for Low-Voltage Conductors



- Increasing pole load design criteria from 8-pounds of wind pressure (56 mph) to 16-pounds of wind pressure (80 mph), enabling its poles to sustain a higher wind pressure in certain areas:

Figure 7-4: Pole Sustainability Improvements



These standards were updated again in 2018 and exceed established ratings set by the CPUC for power lines. LADWP will continue to review and update construction standards according to changing conditions and climate projections. LADWP personnel are reviewing available and developing climate data projections, including wind intensity and wildfire risk models. These projections may be used to update construction standards, ensuring LADWP is prepared for future climate conditions.

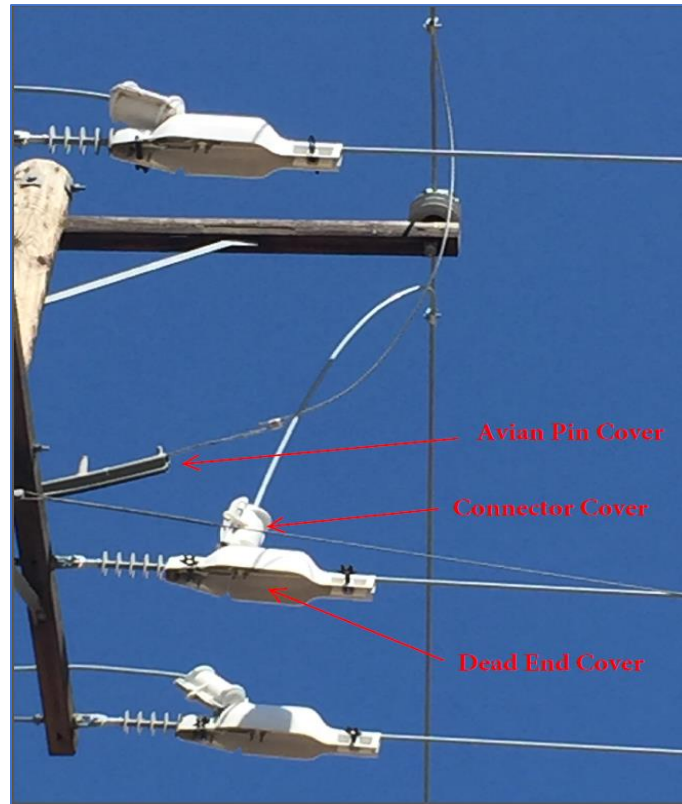
7.1.3 Other Infrastructure Improvement Strategies for Wildfire Risk Reduction

Beyond the updates to LADWP's construction standards, LADWP continues to evaluate new solutions to mitigate the risk of wildfire. LADWP continues to assess the feasibility of installing covered conductor and its various accessories, installing avian protection, installing non-expulsion fuses, and undergrounding overhead lines within LADWP's

service territory. Thus far, LADWP has installed various amounts of covered conductor and avian protection on overhead distribution facilities in HFTDs.

Below is an example of avian protection used to reduce the operational and avian risks that result from avian interactions with electric utility facilities:

Figure 7-5: Avian Protection



Additional wildfire preventive and mitigation strategies being used for infrastructure protection include:

- Backup power is available for critical LADWP facilities in the event of power failure.
- Security has been increased at key facilities to minimize physical security threats.
- Fire extinguishers are installed, where required, for example in facilities and vehicles.
- Each facility manager is also responsible for conducting fire drills for on-site personnel.

7.2 Operations and Protocols

LADWP's operational protocols specify actions that are required, recommended, or prohibited in LAFD Fire Zones and CPUC Tier 2 and Tier 3 HFTDs during normal operating conditions and Red Flag conditions.

LADWP operations and protocols also address the following:

- Situational awareness
- Collaboration with external agencies
- Blocking reclosers on 4.8 kV and 34.5 kV circuits in Tier 3 areas. Higher voltage transmissions lines are not equipped with reclosers.
- Restrictions on testing circuits in Tier 3 areas following fault conditions.
- Incident-based de-energization

These operational protocols are further illustrated in Figure 7-6, the LADWP Wildfire Handout:

Figure 7-6: LADWP Wildfire Handout



7.2.1 Field Operating Conditions: Normal

Note: Energy Control Center (ECC) Operating Conditions are addressed in section 7.2.5. Sections 7.2.1-7.2.2 refer to operating practices in the construction and maintenance-oriented divisions.

LADWP crews follow the protocols listed below when working on energized electrical lines and/or equipment in the LAFD Fire Zones and the CPUC Tier 2 and Tier 3 HFTDs:

- Clear dry vegetation at a radius of 10 feet at the base of the pole
- Have the following required equipment and tools at the immediate work location:
 - Fire Extinguisher
 - Shovel
 - Fire Rake/Pulaski
 - Radio Communication (i.e., portable radio)
- Use caution when using equipment that can create a spark or get hot enough that if laid down could cause a fire (i.e., welding or soldering)
- Do not park vehicles over dry brush (as the exhaust can cause a fire)
- Do not smoke in these designated areas

7.2.2 Field Operating Conditions: Red Flag

During Red Flag conditions, LADWP limits non-essential field work on all Water and Power facilities in the LAFD Fire Zones and CPUC Tier 2 and Tier 3 HFTDs. Only jobs that are essential for public safety or jobs that reduce fire risk will be allowed, including:

- Work for Electric Trouble Section on power restoration
- Repair General Order 95, Rule 18, Level 1 and 2 non-conformances, which are classified in LADWP's work management system as Priority 1, 2a and 2b Trouble Memo Accelerated Codes (TMACs) and Inspection Maintenance Accelerated Codes (IMACs)

LADWP prescribes the protocols listed below during Red Flag conditions:

- Clear dry vegetation at a radius of 10 feet at the base of poles when working on energized electrical lines or equipment
- Fill functioning Water System tanks and reservoirs throughout the City to the maximum operational level feasible
- Equip Water System pump stations with functional generators and/or internal combustion engine-driven pumps for backup power with adequate fuel supplies in place, to the extent practicable and consistent with other demands on LADWP at the time
- Remind all personnel the following must be used with extreme caution during these jobs:
 - Use extreme caution when using equipment that can create a spark or get hot enough that if laid down could cause a fire (i.e., welding or soldering)
 - Do not park vehicles over dry brush (as the exhaust can cause a fire)
 - Do not smoke in these designated areas
- If work must take place, crews are required to have the following available at the immediate work site:
 - Fire Extinguisher
 - Shovel
 - Fire Rake/Pulaski
 - Radio Communication (i.e., portable radio)

In addition to the protocols listed above, LADWP shall ensure readiness to comply with Cal/OSHA's Protection from Wildfire Smoke Standard (Title 8 CCR § 5141.1) with due regard for the wildfire risks that Red Flag conditions signify. LADWP's Wildfire Safety Plan requires:

- Monitoring the Air Quality Index (AQI) for PM_{2.5} at the start of each shift and periodically thereafter, as required to protect employee health. When the AQI for PM_{2.5} is ≥ 151 , impacted organizations must implement exposure control measures such as modifying work practices, relocating employees, providing rest areas with filtered air, or reducing physical intensity consistent with regulatory requirements.
- Provision of N-95 respirators for voluntary use when AQI exceeds 150 and requiring respirator use when AQI exceeds 500.
- Ensuring employee inclusion in the LADWP medical surveillance program when respiratory protection is required.
- Providing required training including wildfire smoke health effects, exposure reduction methods, respiratory protection, medical surveillance, industrial hygiene services, two-way communication systems, and proper respirator use.
- Conducting pre-job planning to ensure provision of personal protective equipment and required training covering occupational hazards commonly associated with Red Flag days and Wildfire events including:
 - Heat Illness Prevention,
 - Workplace Violence Prevention,
 - Hazard Communication,
 - Traffic safety,
 - Worker fatigue

7.2.3 Situational Awareness

LADWP primarily uses these sources to monitor current and forecasted weather data:

- Santa Ana Wildfire Threat Index (SAWTI) - <https://fsapps.nwccg.gov/psp/sawti>
- National Oceanic and Atmospheric Administration (NOAA) - <https://www.noaa.gov/> and <https://www.weather.gov/fire/>
- City of Los Angeles Fire Department Red Flag - <https://ers.lafd.org/redflag/>
- City of Los Angeles Fire Department Fire Weather - <http://lafdweather.blogspot.com/>

LADWP Office of Emergency Management (OEM) receives and sends email notifications from NOAA's National Weather Service (NWS) alerting key LADWP personnel of NWS Red Flag Warnings. Once LADWP receives these notifications, whether from NOAA and/or SAWTI, LADWP will do the following:

- Limit all non-essential work for all Water and Power facilities in HFTDs

- Only perform work required for public safety and to prevent ignition from electrical facilities
- Inspect transmission circuits in Tier 2 and 3 areas prior to energizing for test

LADWP's OEM is expanding its organizational structure to further strengthen the Department's preparedness and response capabilities. As part of this expansion, OEM will establish a Climate Resiliency Team focused on enhancing situational awareness, monitoring weather and climate-related risks, and supporting operational decision-making across the Department.

The Climate Resiliency Team will consist of the following positions:

- Meteorologists
- Climate Scientists
- Climate Analyst
- Fire Coordinators

The team will provide specialized expertise to support LADWP's preparedness and response efforts, including monitoring and assessing weather conditions, wildfire risk, and other climate-related hazards that may impact LADWP operations, infrastructure, and the communities it serves.

LAFD also notifies LADWP's ECC, Distribution Operations, and OEM of LAFD Red Flag Alerts, which differ from NWS Red Flag Warnings. The NWS Red Flag Warnings may not necessarily reflect actual conditions specific to the City, whereas the LAFD Red Flag Alerts are specific to the City. When LADWP receives these Alerts, LADWP will block reclosers on distribution circuits located within CPUC Tier 3 HFTDs unless abnormal system conditions make this imprudent.

LADWP's ECC monitors the following conditions and information:

- Red Flag Warnings and other weather alerts
- Earthquake information
- 14-day hourly weather forecasts by location
- Displays of CPUC Tier 2 and Tier 3 HFTDs
- Displays of active fires

ALERTCalifornia (<https://alertcalifornia.org/>) is also available to support situational awareness within LADWP's service territory and provide aid to first responders and firefighters in the event of a wildfire.

ALERTCalifornia is a public safety program working to understand natural disasters and determine short and long-term impacts on people and the environment to inform management decisions. Based at the University of San Diego, ALERTCalifornia provides access to state-of-the-art fire cameras and associated tools that entities use to enhance situational awareness around wildfire.

7.2.4 Collaboration on Situational Awareness Improvements

LADWP is exploring new technologies and methods, including the use of cameras and weather stations, to increase situational awareness. LADWP intends to share relevant and usable information, where feasible, with LAFD and local fire departments within the Owens Valley to provide the ability to monitor potential wildfire risks around LADWP facilities and to improve operational response to wildfire threats from LADWP, LAFD, and local fire departments within the Owens Valley.

As part of LADWP's continued investment in situational awareness and wildfire resilience, the Department launched a pilot deployment of Watch Duty Teams, a professional-grade version of the Watch Duty platform designed for institutional use. This deployment is supporting operational coordination across Emergency Management, Power System Operations, and field-based response teams.

Watch Duty provides real-time wildfire intelligence derived from trusted sources, including radio traffic, public safety communications, and official incident reporting. The platform advertises that its human-in-the-loop model – staffed by active and retired firefighters, dispatchers, and radio operators – provides timely, accurate and operationally relevant updates.

Watch Duty is currently supporting public agencies across California, including LAFD, LA City and County EOCs, and the Orange County Fire Administration, who are leveraging Watch Duty to:

- Support field crew dispatch and protection
- Enhance common operating picture visibility across departments
- Strengthen cross-agency coordination during fast-moving wildfire events

The Department is also evaluating future integration pathways, including custom GIS layer support and secure API ingestion, to further embed Watch Duty into LADWP's wildfire readiness architecture.

Figure 7-7: Watch Duty

WATCH DUTY

A single, authoritative operating picture for your growing infrastructure footprint

Watch Duty Enterprise offers cutting-edge visibility for industry infrastructure and personnel.

Partner-led infrastructure layers implemented, customized, and maintained with Watch Duty.

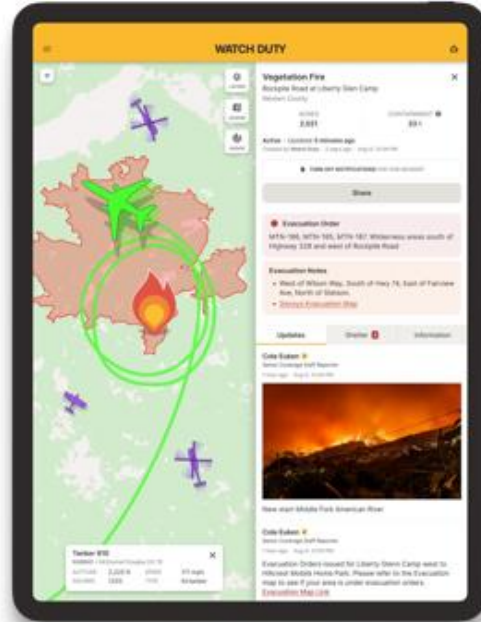
GIS Integration.

Identity Integration (SSO).

Designed to scale.

Enterprise is a Post-Ignition Common Operating Picture

Capability	Utility Outcome
Secure custom GIS layer imports and infrastructure overlays	Faster de-energization decisions, reduce restoration time
SOC 2 Type II compliant security and controls	Clear impact analysis on lines, substations & rights-of-way
Wildfire intelligence delivered to your systems (API, ArcGIS, webhooks)	Crew safety; reduce radio chatter and dispatch delays
Centralized administration and auditability	Audit-ready user management for NERC/CIP compliance



7.2.5 Energy Control Center (ECC)

7.2.5.1 Normal Operating Conditions

LADWP Power System electrical circuits are categorized into three voltage classes, Transmission (138kV, 230kV, and 500kV), Subtransmission (34.5kV), and Distribution (4.8kV).

Overhead Transmission circuits are not equipped with auto-reclosing circuit breakers, but LADWP standard operating protocol is for load dispatchers to re-energize transmission circuits once as a test following a suspected fault. If the re-energization is not successful and the circuit trips a second time, the circuit remains de-energized pending inspection.

The Pacific DC Intertie (PDCI) is a direct current transmission circuit with protection that is programmed to restart the converters and test the circuit after a fault is detected. The normal sequence restarts the converters twice at normal voltage and then once at a reduced voltage. This action is very fast and occurs within one second.

Overhead Subtransmission circuits are normally protected by circuit breakers equipped with auto-reclosers that are programmed to re-energize the circuit once after a pre-determined time as a test following a fault detection. At stations with updated 'substation automation' systems, the auto-recloser can be put into manual mode remotely by the load dispatcher to prevent operation. At stations that have not been 'automated', reclosers can be blocked locally by station personnel at the direction of the load dispatcher.

Distribution circuits (also known as "feeders") are equipped with auto-reclosers. Following a fault detection, most feeders are programmed to test re-energize the circuit once after a pre-determined time and if that test fails, once more after additional time delay. Some circuits are only programmed to test once at a pre-determined time as determined by engineering. Similarly to subtransmission circuits, the auto-reclosers can be blocked remotely at automated stations and can be blocked locally at non-automated stations.

When a circuit auto-recloser cycle goes through the complete auto-recloser process (one or two reclose attempts) and each test was unsuccessful, the circuit remains de-energized. This is commonly referred to as a 'lock-out'.

A circuit is re-energized after a "lock-out", when the trouble that caused the fault condition is located and repaired, or absent that, the circuit is thoroughly inspected, and no cause could be identified.

7.2.5.2 Red Flag Conditions

When a Red Flag Warning is issued by the National Weather Service for areas that contain overhead transmission circuits, all transmission circuits in that area that trip due to experiencing a fault will be inspected prior to being reenergized. The restarts on the PDCI will also be blocked for the duration of the Red Flag Warning, so the PDCI converters will not automatically re-energize the circuit for test after experiencing a fault, pending inspection.

The Grid Operations Senior Load Dispatcher may order a transmission line energized for test without an inspection being performed if the line is required for system security or to prevent a major outage or catastrophic grid event.

When a Red Flag Alert is issued for the City of Los Angeles, all Tier 3 Subtransmission and Distribution Circuits will have the Auto Reclosers blocked, unless doing so would jeopardize the safe and reliable operation of the Power System. The Load Dispatchers will remotely block all circuit Auto Reclosers at automated stations and send personnel to all non-automated stations with Tier 3 circuits to locally block Auto Reclosers on Tier 3 circuits.

Any circuit that relays while their Auto Recloser is blocked will only be re-energized after inspection by a qualified electrical worker and confirmation that no hazard exists throughout HFTD areas.

The blocking of Auto Reclosers on circuits within a Tier 2 area is discretionary and will be assessed based on the known facts and circumstances of the situation.

7.2.6 Incident-Based De-Energization

7.2.6.1 LADWP Current State

LADWP is committed to providing reliable power and promoting public safety. Maintaining electrical service plays an essential role in enabling emergency responders. Protecting community well-being is a key consideration when evaluating any utility-driven de-energization.

To maintain public safety, LADWP evaluates each incident with the available information prior to executing de-energization. These decisions may require judgment by senior decision-makers, who must consider potential adverse impacts on public safety that may, in some situations, outweigh the perceived benefits of an incident-based de-energization. Such impacts may include, but are not limited to, effects on emergency responders, traffic signals going dark, and critical facilities such as fire stations and nursing homes losing power.

LADWP may block reclosers or de-energize its lines in the event of a wildfire, or a specific threat identified by LADWP personnel, if doing so, in LADWP's

judgment, is deemed necessary to promote public safety. LADWP takes these preventive measures while cognizant of its need to comply with relevant federal, state, and local resource planning standards, including contingencies for generation and transmission losses or outages due to any unplanned event.

Within the City, LADWP operates a 24-hour, 7-day-a-week Electric Trouble Section that responds to power-outage related concerns in the distribution system. If LADWP receives a notification regarding a possible hazard, LADWP will send an Electric Trouble Patrol crew to the hazard to determine the appropriate action. If an imminent public safety hazard is identified, the crew will take immediate action by isolating the hazard locally or call the Load Dispatcher to de-energize the power line, or take action in the field to de-energize the portion of the line that poses the hazard.

The LADWP Electric Trouble Section maintains direct emergency phone contacts with both the Los Angeles Fire Department (LAFD) and the Los Angeles Police Department (LAPD), which facilitates coordination among first responders during critical incidents. When any of these agencies alert LADWP to a potential public safety hazard, Electric Trouble crews respond immediately, assess the situation, determine the scope and severity of the hazard, and quickly isolate or de-energize affected equipment if necessary. This close collaboration with LAFD and LAPD strengthens LADWP's ability to mitigate risks promptly and uphold public safety across its service territory.

Within HFTDs, LADWP patrol crews patrol the entirety of a de-energized circuit prior to re-energization. The patrol crew, in conjunction with Electric Trouble personnel, then determines whether to make any necessary repairs and re-energize the line, or to isolate a hazard through switching and re-energize the line from another source if available. LADWP's Customer Average Interruption Duration Index (CAIDI) remains under 3.0 hours across its service territory.

In the event of an incident-based de-energization, LADWP notifies customers through a variety of channels, which may consist of press releases and/or incident updates posted online, sent to media and shared on social media. LADWP may also send notifications to customers via email and through community-based web applications and services such as the NextDoor community news app and local news wire such as CityNews, which disseminates information to local media. The timing of these notifications and the methods used are incident specific and designed to reach customers as effectively as possible. LADWP also has access to the City's Emergency Alert System, which enables the use of the Wireless Emergency Alerts (WEA) if needed.

LADWP will also notify affected neighboring entities that may be impacted by transmission-level de-energization such as Glendale Water and Power or Burbank Water and Power. LADWP will make all efforts to notify these entities in real-time over the phone in the event of an incident based de-energization event.

LADWP will also keep these entities apprised if conditions change and will help ensure lines are repaired and re-energized as soon as practicable.

Within the LADWP Owens Valley service territory, LADWP, in coordination with the Inyo County Sheriff's Office, CAL FIRE, Inyo National Forest and Local Volunteer Fire Departments, patrols HFTDs to determine the appropriate response to a wildfire or other identified threat, which may include blocking reclosers or de-energizing the circuit. LADWP will coordinate with the aforementioned departments prior to re-energizing the circuit.

Due to the urgent nature of incident based de-energization, some notifications may occur after the de-energization event. LADWP will enact the appropriate actions per LADWP internal policies to help ensure that activities which may potentially impact personnel and customer safety comply with federal and state requirements.

LADWP ECC will coordinate with Southern California Edison (SCE) in the event that SCE notifies LADWP of an SCE Public Safety Power Shutoff (PSPS) in areas where LADWP has customers who may be impacted by the shutoff. Through this coordination, LADWP follows existing intercompany work procedures to help ensure the impacted circuits are de-energized and re-energized safely.

7.2.6.2. Awareness of Recent PSPS Research

In June 2025, Stanford Woods Institute for the Environment, Climate & Energy Policy Program issued a report entitled *Wildfire: An Updated Look At Utility Risk And Mitigation* which provided the following statements on the increasing use of Public Safety Power Shutoffs (PSPS):

“The fire season of 2024 saw the expanded use of public safety power shutoffs (PSPS), a utility wildfire mitigation tool which can prevent ignitions by preemptively deenergizing electric infrastructure in high fire-risk areas during dangerous conditions. For instance, Idaho Power, in Idaho, and Xcel Energy, in Colorado, each implemented these shutoffs for the first time in 2024.

The increasing use of PSPS may be an example of shifting norms regarding the standard of care required of electric utilities for wildfire mitigation, as described above. Although litigation in the case is still in progress, an Oregon jury found in 2023 that PacifiCorp acted recklessly and with gross negligence during the 2020 Labor Day wildfires because it did not preemptively deenergize its infrastructure during high fire risk conditions.

Therefore, it's conceivable that utilities in some states may need to demonstrate that they have implemented plans to use wildfire mitigation tools, possibly including PSPS, in order to avoid a finding of negligence in the event of a fire linked to their infrastructure.

As wildfire risk continues to increase across much of the United States, electric utilities in states beyond those that have recently experienced catastrophic fires may be incentivized to create PSPS plans, both in order to prevent ignitions and in order to avoid a finding of liability in the event of an ignition.

However, because PSPS events inherently reduce electric reliability and can cause negative consequences for customers whose power is shut off, particularly during extreme weather events and for customers using critical medical devices that require electricity, the fire-risk benefits of each individual use of PSPS should be weighed against these other potential risks. To facilitate this, PSPS plans should be carefully coordinated between utilities, regulators, and affected stakeholders, including both customers and local governments, to ensure that the use of PSPS does not interfere with emergency response or other critical uses.

For the same reason, electric utilities' PSPS plans should also include programs to mitigate the potential negative impacts of PSPS events when they do occur, such as the provision of backup power for critical users and the use of improved system settings to limit the duration and size of shutoffs."

7.2.6.3. Considerations of Proactive De-Energization

Due to the increase in proactive de-energization-related information and the dynamic nature of this topic, LADWP senior leadership has prioritized research awareness and discussions on proactive de-energization, as evidenced by the Core Focus of the Emergency Operations Subcommittee presented in Table 3-1 under Section 3.5.5.3 "Wildfire Safety Subcommittees."

In addition, in June 2025, a proactive de-energization Workshop facilitated by an experienced wildfire mitigation consulting firm was conducted for LADWP leadership, management, and technical personnel. The agenda included discussions on the following: proactive de-energization background, utility benchmarking, deployable proactive de-energization frameworks, decision-making criteria, protocols, technology requirements, proactive de-energization execution planning, and stakeholder coordination. In the second quarter of 2026, key leaders from LADWP also participated as observers in all three California IOU PSPS tabletop exercises – SDG&E, SCE, and PG&E.

LADWP aims to learn from steps taken by other industry leaders, including technology vendors and utilities, to responsibly develop and apply proactive de-energization protocols. LADWP also continues to engage with various stakeholders including customers, consultants, and employees.

In its initial findings, LADWP identifies that the quantitative risk modeling that informs proactive de-energization decision-making requires substantial wind and other meteorology data, asset failure and ignition data, and dynamic vegetation data. As one of its top priorities, LADWP strives to provide a substantial update to this progress in its next WMP or sooner if warranted. In general, LADWP is

reviewing its circuits and feeders within Tier 3 areas as an initial priority for potentially deploying technology upgrades that could support future proactive-de-energization readiness, followed by Tier 2 and non-HFTD. LADWP has started engaging with various stakeholders and is working to further expand this outreach to ensure impacts are holistically measured and considered, including but not limited to safety, reliability, customer notifications, and financial impacts to customers and communities.

LADWP is continuing to refine its data requirements, modeling capabilities, and infrastructure priorities, and will be continuing to incorporate stakeholder input throughout this ongoing evaluation. The Department will also continue monitoring other utilities' experiences with proactive de-energization to help inform future decisions. Additional updates will be provided in LADWP's next WMP.

While LADWP continues strengthening its operational readiness – including enhancing meteorological insights, improved weather monitoring, refined fire-spread analysis, and other key risk-modeling capabilities – LADWP will implement de-energization of powerlines under the circumstances outlined in Section 7.2.6.1.

7.2.6.4. LADWP Future State

As LADWP continues evaluating the adoption of a proactive de-energization protocol and the infrastructure needed to support it, the Department recognizes the essential role of a rigorous and community-focused Patrol and Restoration Plan. LADWP is committed to deepening its understanding of how customers, neighborhoods, utility staff, and emergency responders are affected at every stage of a proactive de-energization event—from pre-event notification to outage restoration. In prioritizing public safety, continuity, and community well-being, LADWP will document, train, and continuously refine these activities to ensure that any future proactive de-energization program is implemented thoughtfully, responsibly, and with a clear commitment to all those it serves.

7.3 Stakeholder & Community Engagement

LADWP protocols dictate when outage notifications are to be made, what information is to be communicated, to whom, by what means, and how frequently to provide stakeholders awareness of the situation. LADWP operations and protocols also address the following:

- Impacts to Public Safety
- Customer Notification Protocols
- Communication Infrastructure

LADWP is developing a three-year plan update for customer communications and protocols that more clearly identifies and defines customer segments, their specific information needs and addresses gaps in communications channels and technologies.

7.3.1 Impacts on Public Safety

In the City, LADWP considers impacts to public safety from unplanned outages and has developed protocols in the event that they occur. When a power outage occurs, LADWP's practice is for the Electric Trouble Section to notify LAPD and LAFD of the areas affected. Electric Trouble Section also sends out summary outage emails when the group is at an elevated response level or when directed by Transmission and Distribution subsystem management. The information given includes the community affected by the outage, the estimated time of restoration, and any updates throughout the outage period, including the time of actual restoration.

Members of the Los Angeles Mayor's office are notified via email of significant outages impacting 10,000 or more customers. Communications and Community Affairs responds to inquiries for additional information from the Mayor's office and coordinates the response based on available information from either Electric Trouble, ECC, or Power System executives.

Members of LADWP Legislative and Intergovernmental Affairs (LIGA) receive the same summary outage emails and provide information and respond to inquiries from affected City Council offices. LADWP sends automated phone call notifications to life support equipment discount customers with a power outage tolerance of 8 hours or less when the Outage Management System determines they may be impacted by an outage. The following parties within LADWP are also notified:

- City of Los Angeles Board of Water and Power Commissioners
- Chief Executive Officer and Chief Engineer/General Manager
- Chief Operating Officer and Senior Assistant General Manager of Power System
- Chief Operating Officer and Senior Assistant General Manager of Water System
- Senior Assistant General Manager and Chief Climate Resilience and Office of Emergency Management Officer
- Chief Customer Officer and Senior Assistant General Manager of Customer Service, Communications, and Community Affairs
- General Counsel (City Attorney's Office)
- Power System Executive Management and Directors
- Director of Water Operations
- Director of Water Distribution
- Executive Director of the Office of Emergency Management
- Communications and Community Affairs
- Key Accounts
- Office of Emergency Management 24/7 Duty Officer

The Key Accounts team is notified of outages on 34.5kV distribution system circuits directly by ECC. The Key Accounts Representative takes the circuit and outage information received from ECC to determine if there are any schools, hospitals, and

other emergency services affected by the outage and then provides those organizations with notifications and updates.

Within LADWP service territory in Owens Valley, LADWP, in coordination with the Inyo County Sheriff's Office, CAL FIRE, Inyo National Forest, and Local Volunteer Fire Departments, patrols Elevated Fire Threat Areas to determine the appropriate action, such as notifying affected stakeholders and communities.

If at any time outages exceed 10,000 customers, LADWP OEM notifies the City Emergency Management Department (EMD) Duty Officer of the current total number of outages and a breakdown of outages by community. This data is obtained from the Electric Trouble Section. As long as the outages exceed 10,000 customers, OEM will continue to report at least twice daily to these entities.

The Los Angeles County Office of Emergency Management may request information on any potential or actual impact to the LADWP Power System. The Federal government or State agencies, such as California Office of Emergency Services (Cal OES), may also submit requests for this information which are funneled through the Los Angeles County Office of Emergency Management. LADWP OEM serves as the Department's liaison to these organizations as well as all other public safety stakeholders. Upon request, and in accordance with the requirements of the City's Emergency Operations Organization, OEM will provide information pertaining to public safety impacts as needed.

7.3.2 Customer Notification Protocols

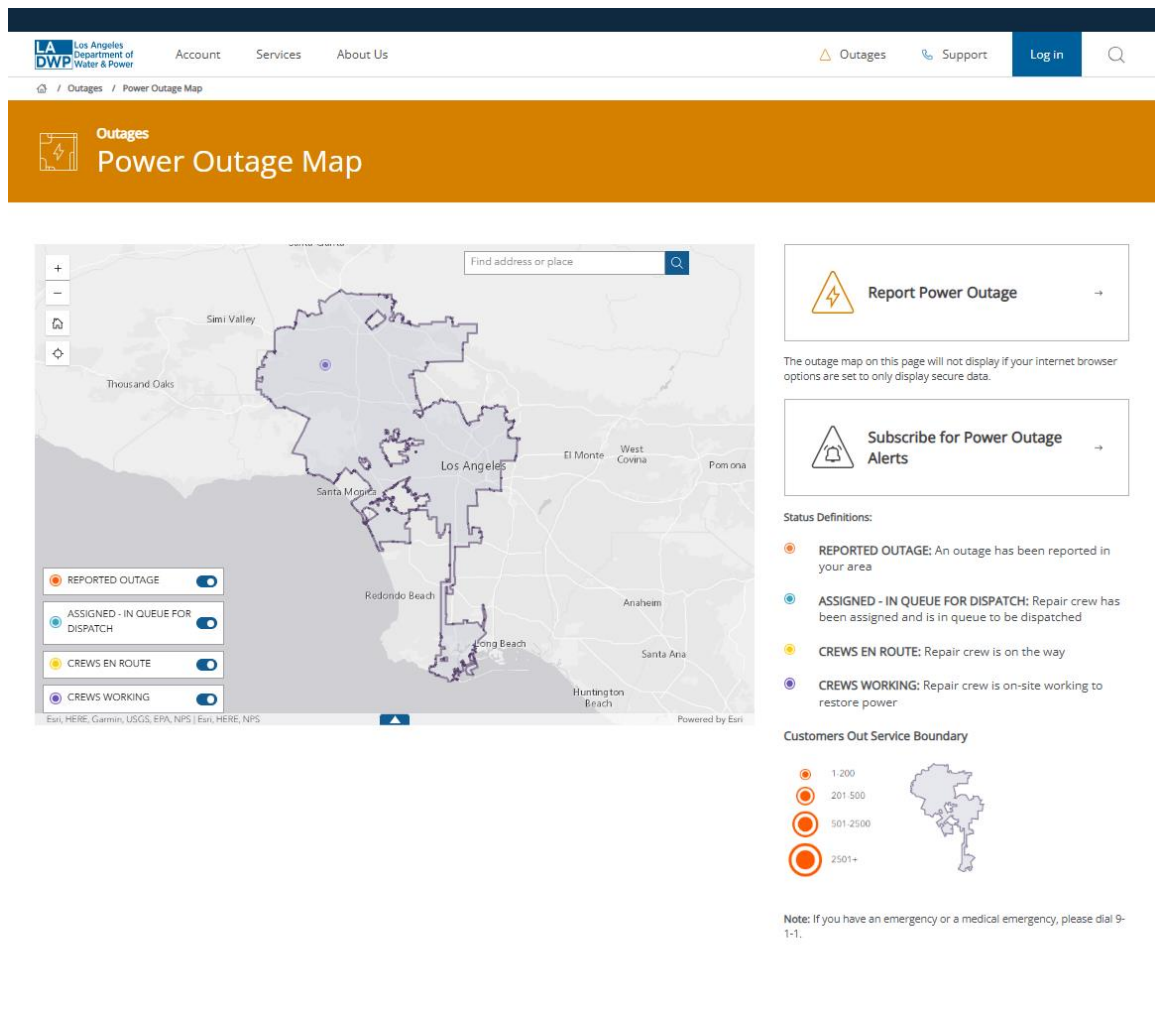
In the event of a wildfire, LADWP utilizes several customer communication channels to keep customers safe and informed.

Outage information is made available to customers on LADWP's Outage Management website, which provides information for affected customers in the Los Angeles service area and allows customers to report power outages. LADWP's outage information webpage is linked below:

<https://www.ladwp.com/outages>

This site can also be accessed by going to www.LADWP.com and clicking on the top right corner "Outages". A sample of what the customers will be able to see from the website is shown in Figure 7-8, below.

Figure 7-8: LADWP Outage Management System



Website and page-specific banners are also added to the LADWP website, www.LADWP.com, to provide important updates or alerts regarding larger-scale outage or public safety events impacting customers.

LADWP also notifies subscribed customers of major community outages within its service territory via text message and/or e-mail notifications in English and Spanish. In order to receive notifications, customers must subscribe to LADWP's Outage Alerts on

the website via its outage information webpage as seen above (www.ladwp.com/outages) or by visiting www.ladwp.com/OutageAlert for more information.

LADWP utilizes its social media channels, primarily on X.com and Nextdoor.com to provide outage information and updates. Outage updates are typically posted on <https://nextdoor.com/> to just the affected communities, as the platform allows for targeted distribution of messages to select areas in the city, including the ability to send messages out to the entire service area, if desired. Updates and customer replies are also sent using the Department's X handle: @LADWP. In addition, LADWP also posts news releases on www.LADWPnews.com and sends these to members of broadcast media. During emergency events, the cadence is typically to provide two updates per day and to adjust accordingly as more frequent or infrequent updates are needed as the event unfolds.

As noted above, the Key Accounts team notifies its Premier¹⁴ customers of outages on the 34.5kV distribution system circuits. Premier customers are able to choose the notification type, time and channel, with staff utilizing the Everbridge platform to provide outbound notifications, estimated restoration times, and other updates.

In the Owens Valley, LADWP's customers can report a power outage or reach customer service by calling (800) 992-8331 or (833) 325-2397 after hours. Additionally, LADWP customers in the Owens Valley can visit www.LADWP.com/EasternSierra for more information.

LADWP is developing more detailed customer communication protocols specific to wildfire emergencies that identify customer information needs by segment, outline existing channels, and address needs to augment communication tools and technologies.

7.3.3 Communications Infrastructure

LADWP's communication infrastructure is necessary to help ensure that information sharing can be maintained with all critical stakeholders, including other City departments, and Southern California Public Power Authority (SCPPA) during an emergency.

A local emergency can heavily impact the City's communications systems, especially those resources dedicated to immediate response efforts. LADWP Power System uses the following communication devices and systems for primary and redundant communication needs:

- Vehicle and Handheld Radios (Low Band, Ultra-high Frequency, and 900 MHz)
- Voice Over Internet Protocol Telephone System
- Cellular Phones

¹⁴ See section 3.7.1.4 for definition of Premier customer accounts

- Satellite Phones
- Dedicated Power Operations Phone System (DPOPS)
- Microwave Communication System
- Data Systems (e.g., Outage Management System [OMS])
- Amateur Radio (Ham Radio)
- Analog Phone Lines

LADWP has satellite phones assigned to the Chief Operating Officer and Senior Assistant General Manager of the Power System, Chief Operating Officer and Senior Assistant General Manager of the Water System, Power System employees, Water System employees, facilities, mobile command centers, and other key stakeholders.

Any coordination between LADWP and Communication Infrastructure Providers will be filtered through the Electric Trouble Section if damage to communication lines has occurred. However, if time permits, LADWP will take the necessary steps to notify affected stakeholders.

7.4 Workforce Training

LADWP has implemented training programs for its workforce to take actions and increase awareness of the hazards of wildfires during elevated fire threat conditions and the potential sources of ignition.

7.4.1 WMP Training

LADWP provides annual training to employees who have WMP responsibilities. This training is provided to the appropriate personnel annually and as needed, if there are any major changes to the WMP. The WMP, presentation, and related materials are reviewed, updated, and disseminated prior to workforce training.

Such training includes, but is not limited to, Fire Extinguisher Training and Working in HFTDs during Red Flag Conditions. The training also requires participation in OEM meetings and both internal and external table-top drills and exercises with the other City departments through the LADWP Office of Emergency Management and the City Emergency Management Operations Organization.

LADWP conducts a variety of drills and exercises to strengthen organizational readiness for wildfire related events. These activities involve multiple operational, technical, and support divisions across the Department. Because many exercises, particularly tabletop exercises (TTXs), require broad participation and coordinated involvement from various units, they are organized under the Office of Emergency Management (OEM). OEM provides the framework for planning, facilitating, and evaluating drills that incorporate cross-functional communication, operational coordination, field response, and administrative support. Centralizing these activities under OEM ensures a consistent, departmentwide approach to preparedness and supports LADWP's ability to meet the objectives outlined in the Wildfire Mitigation Plan.

7.4.1.1 Drills and Exercises

Table-top drills and functional exercises consist of the following topics and activities:

- Brushfire, Earthquake, El-Nino, Tsunami, Damage Assessment Team, and Grid-Ex
- Command and Management Activation Activities
- Annual Citywide EOC Exercise
- Partner Utility/Association Exercises

As an example, LADWP routinely holds a Power System Command and Management Exercise with objectives to provide:

- An overview of the Incident Command System (ICS), Standardized Emergency Management System (SEMS), and National Incident Management System (NIMS)
- An overview of Power System command centers, such as the Power Distribution Operations Center (PDOC)
- An introductory overview of ICS forms and their use

In addition to internal training, LADWP also participates in drills and exercises in collaboration with SCPPA, American Public Power Association (APPA), Western Region Mutual Assistance Group (WRMAG), other partner utilities, and the City's EOC.

7.4.1.2 Qualified Person and Qualified Electric Worker (QEW) Training

Workforce training includes, but is not limited to, training to become a Qualified Person and training to become a QEW.

A Qualified Person is an employee that has completed LADWP-approved training and demonstrated competency related to the scope of their work in:

- Operations to be performed
- Hazards involved with work
- Hazards involved in the work environment where work is performed

A QEW is an employee who fulfills the requirements of a Qualified Person and has a minimum of 2 years of training and experience with high-voltage circuits and equipment. A QEW is allowed to work on or work near equipment within the minimum approach distance of exposed, energized high-voltage circuits and equipment if precautions are taken to help ensure employee safety.

LADWP also provides its QEWs with Annual Refresher Course training. Such training includes, but is not limited to, the following:

- Pole Top, Bucket, and Vault Rescue
- Fall Restraint and Prevention
- First Aid, Cardiopulmonary Resuscitation (CPR), and Automated External Defibrillators (AEDs)
- Personal Protective Equipment (PPE)
- Injury and Illness Prevention Program (IIPP)

7.4.2 Joint Labor Management (JLM) Committee

When new equipment or material is introduced, it goes through the JLM Committee. This committee determines whether the new equipment or material will provide a safer work environment and/or increase reliability for the Department and its customers. Once this has been determined, the committee sets up mock installations at the LADWP Training Center.

At this point, the JLM Committee determines whether specific training is required and, if so, training modules are developed prior to the new equipment or material being released to the field crews. If specific training is not required, at a minimum, the JLM Committee produces a Bulletin with instructions introducing the new equipment or material.

7.4.3 Internal Wildfire Information Website

Additionally, LADWP maintains its own internal wildfire information website for LADWP employees to use when working in LAFD Fire Zones and Tier 2 and Tier 3 HFTDs. The website contains the latest version of the LADWP WMP, links to other resources and training materials, and reminders of what tools and equipment are required under all conditions, including Red Flag conditions.

7.5 Agreements with CAL FIRE on Firefighting Support

LADWP currently has a Memorandum of Understanding (MOU) in place with CAL FIRE that supports firefighting activities in the Owens Valley until June 30, 2029. The MOU is renewed or renegotiated every five years and is only with CAL FIRE. No such agreement or MOU exists with the Bureau of Land Management (BLM) or the United States Forest Service (USFS). Background information on the history of LADWP/CAL FIRE firefighting agreements and a description of the current MOU reimbursement process are presented below.

7.5.1 Water System Wildfire Operations

The LADWP Water System maintains and operates equipment in areas within and adjacent to lands where the primary responsibility for wildland fire suppression rests with CAL FIRE.

LADWP and CAL FIRE have collaborated to combat wildfires on LADWP land for over thirty years. During this time, there have been multiple MOU agreements, each signed off by the Aqueduct Manager. Originally, LADWP provided support at its own expense,

absorbing any costs incurred during support operations. More recently, over roughly the last ten years, CAL FIRE reimbursed LADWP for any support provided during firefighting operations.

Under this agreement, LADWP staff inspect equipment used for fire suppression to determine whether it is in safe working condition. LADWP operators assigned to firefighting activities complete annual firefighter safety training and wear required and approved wildland personal protective equipment during assignments.

7.5.2 Reimbursement Process Under Agreement

LADWP/CAL FIRE MOU reimbursement rates are established by predetermined contract rates set by the State of California. When needed, CAL FIRE will request support to combat a wildland fire located on LADWP property. Support usually consists of dozers, water pumps, water tenders, and associated personnel. LADWP supervisors track equipment used during the fire and all labor hours worked. This information is then submitted to CAL FIRE for billing.

CAL FIRE provides an invoice for reimbursement to LADWP for review and signature prior to payment. Following the review and approval process, reimbursement checks are sent to LADWP from the state. The amount of reimbursement varies with the level of support provided. As an example, LADWP recently received roughly \$60,000 in reimbursement for support provided during the Horseshoe Fire.

Reimbursements are received by administration staff and deposited into the appropriate accounts.

7.6 Federal Wildland Fire Workforce

In response to a Congressional request, Stanford Woods Institute for the Environment issued a report by the Smoke: Wildfire Science and Policy Practicum entitled *Developing And Supporting The Federal Wildland Fire Workforce*, dated August 2023. This report contains the following conclusions:

“Progress is being made on the issue of bolstering the federal wildland fire workforce: the Infrastructure Investment and Jobs Act, as well as the Inflation Reduction Act, each contained historically unprecedented increases in support of our federal wildland firefighters. Encouragingly, we are also witnessing the introduction and reintroduction of other forward-looking wildland fire policy legislation in Congress, including: the FIRESHEDS Act, which would triage Forest Service mapping data to identify highest-risk “firesheds” and expedite fuels treatment projects on those landscapes; and Tim’s Act, which would implement many of the recruitment and retention supports, including increased pay and benefits...”

8.0 Emergency Management

8.1 Emergency Management 3-Year Plan

The three-year plan for the Office of Emergency Management (OEM) focuses on expanding organizational capacity, strengthening operational capabilities, and advancing a culture of preparedness across LADWP's power, water, and joint systems. OEM, now part of the newly established Climate Resiliency, Emergency Management and Olympics (CREMO) division reporting directly to the Interim General Manager, is undergoing significant growth to support these objectives.

OEM is adding more than 15 new positions—including Emergency Management Coordinators, Fire Coordinators, Meteorologists, Intelligence Analysts, and Climate Resilience professionals—and constructing a new state-of-the-art Department Emergency Operations Center to enhance coordination before, during, and after emergencies, major events, and disruptive incidents. The division is also upgrading communications and incident management infrastructure, including a new interoperable radio system, situational awareness tools such as wildfire detection cameras, and enhanced incident management software.

Training and preparedness programs are being expanded through ICS training requirements for staff, improved emergency management training, and increased internal and external exercise participation to strengthen partnerships and response capabilities. OEM is also improving GIS capabilities and enhancing coordination across LADWP's Security Services, Risk Management, Fleet Services, and other divisions to support an integrated response framework.

OEM's expanded capabilities and upgraded technologies will strengthen communication pathways across power, water, and joint systems, ensuring information flows quickly, consistently, and accurately during routine operations and emergencies. These initiatives will bring departments together through shared tools, unified training standards, and coordinated planning, resulting in a more cohesive and interoperable organization.

Additional priorities include updating hazard mitigation actions, aligning mitigation projects with department and citywide goals, restructuring internal processes to align with Incident Command System/National Incident Management System principles, and assuming management of mobile command vehicles to streamline resource readiness.

8.2 Emergency Operations Organization (EOO)

The EOO is an organizational structure established by the City to centralize the planning, coordination, and management of disaster preparedness, mitigation, response, and recovery. By unifying command and information flow, the EOO enables an efficient and effective chain of command for managing the City's resources during emergencies. Created by ordinance and directed by the Mayor, the EOO brings together various departments, agencies, and organizations to facilitate a coordinated response, with responsibilities distributed among the

Mayor's office, the Emergency Management Department (EMD), and functional divisions. The EOO is governed by the Emergency Operations Board (EOB), which provides policy guidance and regulatory oversight of the EOO in support of the City's overall emergency planning, response, and recovery activities. For a detailed description of the EOO's organizational structure, authorities, and functions, refer to Chapter 3 Article 8 of the LACAC¹⁵.

8.3 City Emergency Operations Center (EOC)

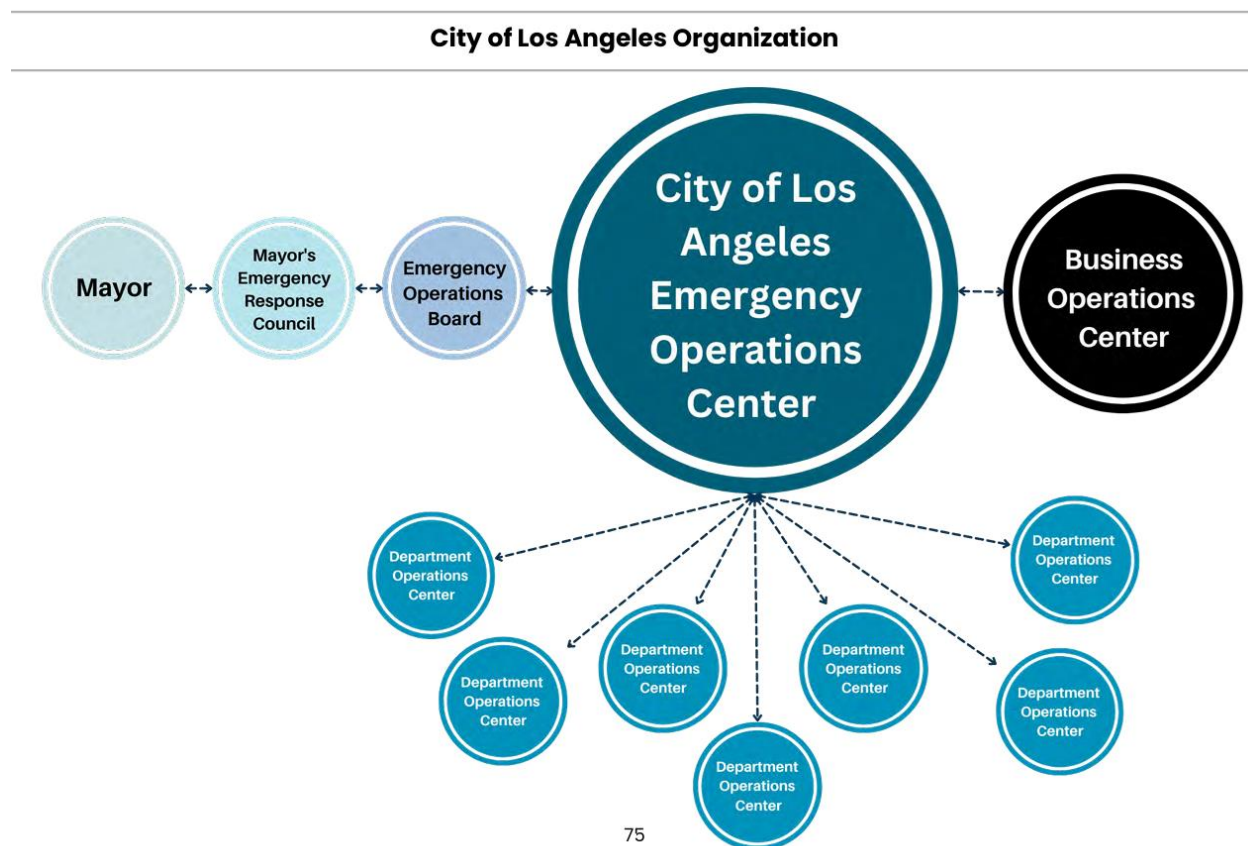
During a major emergency or planned event, the City's EOC acts as the central hub for coordinating multi-agency response operations, resource management, public information, and cost tracking. EOC processes follow the National All-Hazards approach to major disasters such as fires, floods, earthquakes, acts of terrorism, and large-scale events in the City that require involvement by multiple City departments.

The EOC brings together City departments, volunteer organizations, and county, state, and federal agencies, as well as other stakeholders, to ensure a unified response. The EOC is typically activated when an incident requires coordination and resource management beyond the capacity of individual City departments. While the EOC does not manage tactical field operations directly, it plays a critical support role by securing additional resources, disseminating information, and facilitating interdepartmental planning for anticipated needs. Upon activation the EOC establishes communication and coordination channels between field incident commanders and department operations centers (DOCs) involved in the response.

When requested by EMD, LADWP personnel are assigned to key positions within the EOC Operations Section, including the Utilities Branch Director, Power System Unit Leader, and Water System Unit Leader, as depicted in Figure 8-1 below. These representatives are responsible for providing situational updates on LADWP operations and managing requests for information and resources. Although the EOC and LADWP's Department Emergency Operations Center (DEOC) are separate entities, they work in close coordination to support effective emergency response operations. Figure 8-1 provides a visual overview of the EOC organization structure and reporting relationships.

¹⁵ Available https://codelibrary.amlegal.com/codes/los_angeles/latest/laac/0-0-0-33694

Figure 8-1: City of Los Angeles Emergency Operations Center Organizational Chart



8.4 Department Emergency Operations Center (DEOC)

LADWP's Department Emergency Operations Center (DEOC) serves as the Department's primary coordination hub during major emergencies and planned events. It supports situational awareness, information sharing, operational coordination, and resource management throughout response and recovery efforts. The DEOC is organized in accordance with the Incident Command System (ICS), aligning with the City's Emergency Operations Organization (EOO) and the State Emergency Management System (SEMS). It is staffed by senior management personnel from across the Department, with specific assignments determined by the nature and scope of the incident. The DEOC is led by a designated Director with delegated authority over all operational decisions.

When activated, the DEOC establishes department-wide incident objectives and provides oversight of system-level response and recovery activities. These activities are typically coordinated through system-level operations centers (described below) and carried out by field personnel. The DEOC also works closely with the City's Emergency Operations Center (EOC),

when activated, to share information, coordinate resources, and ensure alignment with broader citywide response and recovery efforts.

LADWP is in the process of implementing a new state-of-the-art DEOC facility. The new facility will include advanced technologies, situational awareness tools, dedicated spaces for Public Information Officers (PIO) real-time media and social media monitoring, partner agencies to co-locate, and a communications room with redundant communications modalities like satellite, radio, microwave, and amateur radio capabilities.

8.5 Power Distribution Operations Center (PDOC)

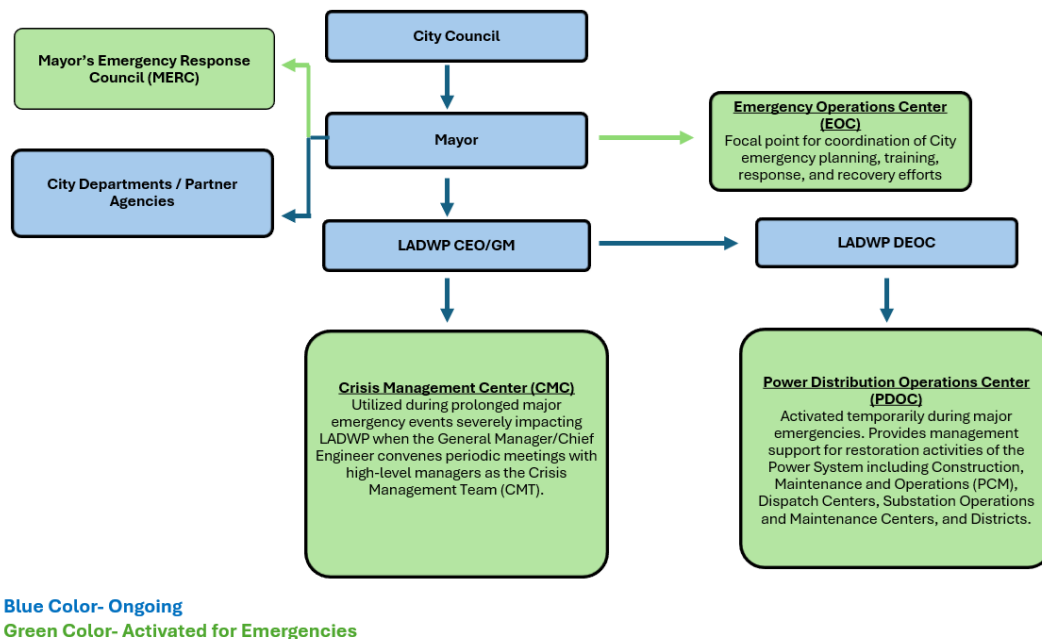
When activated during a major emergency, the PDOC coordinates the restoration efforts of the Energy Control Center, dispatch centers for Power Construction & Maintenance and Substation Operations and Maintenance, and the Districts. While the PDOC does not replace standard procedures for reporting damage or dispatching work, it supplements these processes by organizing all available resources to restore electric service to the community as quickly as possible. Additionally, the PDOC maintains situational awareness by continuously assessing the extent and status of the emergency and acquiring additional resources to support restoration efforts as needed.

8.6 Water Emergency Command Center and Emergency Deployment

When activated in the event of a major emergency, the Water Emergency Command Center coordinates and supports Water System-wide emergency response and recovery operations. The Water Emergency Command Center is a designated hub where assigned personnel coordinate information and resources in support of Water System field level, on-scene emergency response and recovery operations. The Water Emergency Command Center is composed of personnel from the Water Executive Office, the Water Resources Division, and the Water Engineering and Technical Services Division. During an emergency, the Water Distribution and/or Water Operations Divisions act as the Water System's Incident Command (IC), which is responsible for Water System field level, on-scene emergency response and recovery operations. The Water Quality Division may activate an IC when a boil-water notice is issued.

In the event of wildfire or other emergency incidents, the Water System may deploy their Mobile IC, emergency response vehicles, and operations staff to make any necessary system changes to support local emergency responders and regional IC operations.

Figure 8-2: LADWP Power System Emergency Centers



8.7 Additional Emergency Resources

If LADWP Power System requires additional resources because of a major emergency, it can use LADWP OEM to contact external utility agencies and associations for mutual assistance. LADWP is a signatory to agreements with the following associations:

- Southern California Public Power Authority (SCPPA)
- American Public Power Association (APPA)
- Western Region Mutual Assistance Group (WRMAG)

Additionally, a review of mutual aid agreements is completed on an annual basis to help ensure that the Department can address hazards and threats. The Customer Service Division and the Communications and Community Affairs Division also play an integral role in relaying information regarding LADWP's response to hazard-related outages to the public.

As previously mentioned, LADWP also participates in the WRMAG's Western Region Mutual Assistance Agreement, which is a mutual assistance agreement covering utilities across several western states.

As a member of SCPPA, LADWP is actively involved in the network of local public power utilities to meet future customer expectations and enhance operational efficiencies. Through this network, members have developed a mutual aid playbook to improve the process of obtaining

mutual aid in the Southern California region. The SCPPA Playbook provides the following for a streamlined mutual aid process:

- A framework for communication between SCPPA members, and the APPA
- A structure for collaboration during emergencies and the need for mutual assistance
- A facilitation of communication among SCPPA members and other agencies

LADWP's OEM participates in conference calls coordinated by SCPPA, WRMAG, and APPA regarding actual and potential requests for mutual assistance by external utilities. LADWP's OEM also participates in conference calls with the City's Emergency Management Department (EMD) regarding actual and potential threats, such as extreme heat events, high winds, and rainstorms.

In addition, LADWP's Water System has a Multi-Agency Water Mutual Assistance Agreement (MAWMAA) with East Bay Municipal Utilities District in Oakland, California, and Las Vegas Valley Water District in Las Vegas, Nevada. Each of the three parties in the MAWMAA agrees to provide equipment, supplies, and personnel when requested and available in times of emergency. The Water System Senior Assistant General Manager is the primary authorized representative for the MAWMAA on behalf of LADWP, and the Director of Water Distribution is the alternate authorized representative.

If LADWP Water System requires additional water supplies due to an emergency, it can purchase from its supplemental water supplier, the Metropolitan Water District of Southern California (Metropolitan). LADWP has several regular and emergency water connections to Metropolitan throughout its service area. In addition to its typical available supplies, Metropolitan is also capable of delivering water from its Emergency Storage Program that sets aside emergency supplies for the Metropolitan service area.

8.8 Actual or Potential Threat Impacting the City

If there is an actual or potential threat impacting the City, and LADWP action is required, LADWP may do the following:

- Send responders to the City EOC, if it is activated
- Activate LADWP DEOC to coordinate all activities by Water, Power, and Joint Systems
- Activate the Power Distribution Operations Center (PDOC)
- Activate the Emergency Command Center (EmCC)
- Update SCPPA and the EMD Duty Officer regularly on numbers of electrical outages and LADWP's actions in response to those outages.

8.9 Standardized Emergency Management System (SEMS)

SEMS is the fundamental structure mandated by law for the response phase of emergency management throughout California. This system unifies all elements of the California emergency management community into a single integrated system with standardized key elements.

SEMS incorporates the Incident Command System (ICS), a field-level emergency response system based on management by objectives, as well as inter-agency coordination and mutual aid. SEMS facilitates both the flow of information within and between levels of the system and coordination among all responding agencies.

All LADWP and City emergency operations follow protocols and procedures of ICS, the California SEMS, and the National Incident Management System (NIMS).

LADWP participates in annual tabletop exercises as a part of the City's SEMS structure. This training incorporates active participation from all departments throughout the City as discussed in Section 7.4, "Workforce Training." LADWP also participates in drills and exercises held by the City's EOC, SCPPA, APPA, and WRMAG.

8.10 Memoranda of Understanding (MOUs)

LADWP maintains formal Memoranda of Understanding (MOUs) with the Western Energy Institute (WEI) and the American Public Power Association (APPA) that directly support the implementation of the Department's Wildfire Mitigation Plan (WMP). These MOUs facilitate structured collaboration, technical coordination, and the exchange of industry best practices related to wildfire risk reduction, operational preparedness, and utility system resilience. Through these agreements, LADWP participates in wildfire focused trainings, regional coordination initiatives, and mutual assistance planning efforts that enhance organizational readiness.

These partnerships further complement the responsibilities of the Office of Emergency Management (OEM) by strengthening interagency coordination, improving situational awareness, and supporting standardized emergency management practices. Integration of WEI and APPA resources within OEM activities ensures alignment with regional and national utility emergency response frameworks, and reinforces LADWP's capabilities to prepare for, mitigate, and respond to wildfire related incidents in accordance with WMP objectives.

8.11 Wildfire Recovery and Service Restoration

LADWP takes reasonable and practicable actions to prevent fires resulting from our electric facilities and to restore service following an emergency. LADWP implements the following recovery steps after an emergency event:

- Maintain Core Services
- Perform After Action Reporting
- Implement Restoration Plan
- Prepare for Federal and State Public Assistance
- Streamline Rebuilding Process Where Possible

The WMP is designed for disaster preparation, response, and safe and efficient recovery from any type of outage caused by exogenous forces, including those resulting from wildfires. Communication by LADWP during an active emergency, such as a wildfire, will be in

accordance with SEMS as necessary and will be at the direction of the entity responsible for disseminating information about the emergency.

9.0 Community Outreach and Public Awareness

Keeping LADWP's customers informed and aware of proactive planning and action to mitigate wildfires is of utmost importance. LADWP will share the availability of this WMP and highlight LADWP's ongoing work to advance WMP-related activities through a variety of channels.

9.1 WMP Presentation to LADWP Board

LADWP presents the WMP to the Board of Water and Power Commissioners on an annual basis. The annual LADWP Board presentation will allow for public engagement, the opportunity for public comment, solicitation of feedback from the LADWP Board, and the sharing of any pertinent public service announcements.

9.2 LADWP Website

LADWP's Wildfire Mitigation Plan is available for public review and download at the following link: <https://www.LADWP.com/WildfirePlan>. The WMP is also made available through the LADWP in Eastern Sierra page at: <https://www.ladwp.com/who-we-are/ladwp-eastern-sierra>.

For further information on the City's wildfire prevention and wildfire mitigation efforts, LADWP customers can visit <https://www.lafd.org/wildfire>. For the Owens Valley, LADWP customers can visit <https://www.cityofbishop.com/departments/fire> and <https://www.readyforwildfire.org/>.

9.3 Public Comment

LADWP also accepts comments from the public via the e-mail link: wmp@ladwp.com.

9.4 Neighborhood Council Meetings

Upon request, LADWP will provide updates and presentations on WMP content to affected Neighborhood Councils listed in Appendix B, "LADWP Fire Threat Maps," and the Neighborhood Council Coalitions listed below at one of their regularly scheduled meetings:

- Los Angeles Neighborhood Council Coalition
- Valley Alliance of Neighborhood Councils
- Westside Regional Alliance of Councils
- Alliance of River Communities
- Harbor Alliance of Neighborhood Councils

9.5 Media and Social Media

LADWP shares the WMP with the media through a press release. The WMP's availability will also be posted on the LADWP's newsroom (www.LADWPNews.com/) and social media channels to highlight LADWP's proactive planning and ongoing efforts to create resilient Water and Power Systems.

9.6 Wildfire Mitigation Customer Education & Outreach Program

LADWP is developing a robust customer education and outreach program for wildfire safety and awareness, based on previous crises responses, best practice, and market research including surveys and focus groups. There are also ongoing efforts to raise awareness about LADWP's initiatives and investments in system hardening, crisis readiness, and wildfire responsiveness, as well as how LADWP plans to manage and mitigate the impacts of wildfire-related power shutoffs.

10.0 Metrics, Monitoring, and Continuous Improvement

10.1 WMP Metrics

As part of its wildfire mitigation measures and broader risk management cycle, LADWP continues to develop, revise, upgrade, and track metrics to evaluate WMP performance and support continuous improvement. This step continues to expand on Principles 5 and 6 (of 6), Risk Reporting and Risk Monitoring.

The Performance Tracking & Evaluation subcommittee tracks and reports on data in three key areas:

- **Risk Assessment** – quantities directly or indirectly representative of outstanding threats and vulnerabilities having to do with wildfires
- **Risk Buydown** – quantities related to control and mitigation programs, highlighting the most impactful programs' performance versus their projected targets
- **Outcome Metrics** – quantities related to bottom-line results, namely the quantity of ignitions and/or wildfire events within the region – in lieu of actual ignition events, standard electric reliability indices are monitored as a proxy

10.1.1 Risk Assessment Metrics

LADWP supports ongoing and expanded collaborations with other state utilities to continue learning about science, technology, and operational best practices. LADWP is an active participant in benchmarking, knowledge sharing, and joint advocacy with CMUA. LADWP is also becoming increasingly involved with participating in drills and functional exercises with California investor-owned utilities – PG&E, SCE, and SDG&E. LADWP also maintains awareness of the IOUs' ongoing Climate Adaptation Vulnerability Assessments (CAVA), Risk Assessment Mitigation Phase (RAMP) reports, General Rate Case (GRC) filings, and other CPUC or OEIS directives and state legislative activities relating to wildfire risk.

10.1.2 Risk Buydown Metrics

Metrics tracking relative risks that impact LADWP and are outside of LADWP's control are considered external risk metrics. Examples of this metric type include Red Flag Warning Days and Red Flag Alert Days, as shown in Table D-1, "Number of Red Flag Warnings and Red Flag Alerts," in Appendix D, "LADWP Metrics."

The National Weather Service forecast zones that impact LADWP's service territory are CAZ368 - Los Angeles County Inland Coast, CAZ362 - Malibu Coast, CAZ581 - Owens Valley South, and CAZ582 - Owens Valley North. LADWP continues to study trends in Red Flag Warnings and adjusts field and control center protocols as described in section 7.2 of this report. If the DEOC is activated for any of these events, the Emergency Management organization facilitates After Action Reviews.

In addition, LADWP has access to NOAA's Climate Data Online Data Tools to obtain and utilize other external risk metrics for various locations in LADWP's service territory. Other platforms being considered for future use include Watch Duty, as described in Section 7.2.4, "Collaboration on Situational Awareness Improvements."

10.1.2.1 Reliability Performance

As LADWP continues to develop formal metrics and quantifications of wildfire risk reduction, LADWP utilizes its robust history and tracking of standard reliability metrics. Reliability performance should be tracked against system hardening efforts to determine post-mitigation risk buydown. Tracking reliability indices may serve as a reliable proxy for equipment-caused ignitions, which directly relate to wildfire risk. LADWP tracks the following reliability metrics:

- Number of distribution outages
- Percent of distribution outages in HFTD
- Number of transmission outages
- Percent of transmission outages in HFTD
- System Average Interruption Frequency Index (SAIFI)
- System Average Interruption Duration Index (SAIDI)

10.1.3 Outcome Metrics

Outcome Metrics measure outcomes that may be associated with an increased risk of utility-caused wildfires.

10.1.3.1 Outages Within HFTDs

LADWP tracks the following outage information for its Outcome Metrics:

- Distribution Outages Within HFTDs – 4.8 kV systems
- Subtransmission Outages Within HFTDs – 34.5 kV systems
- Transmission Outages Within HFTDs – all systems greater than 34.5 kV

The Outcome Metrics on outage percentages within HFTDs during calendar years 2019 through 2024 are shown in Table D-2, "LADWP Outage Percentages Within and Outside HFTDs," in Appendix D, "LADWP Metrics."

10.1.3.2 Total Distribution, Transmission, and Subtransmission Outages

Recent LADWP outage statistics are illustrated in the following figures:

Figure 10-1: Outage Totals By Year
Outage Totals

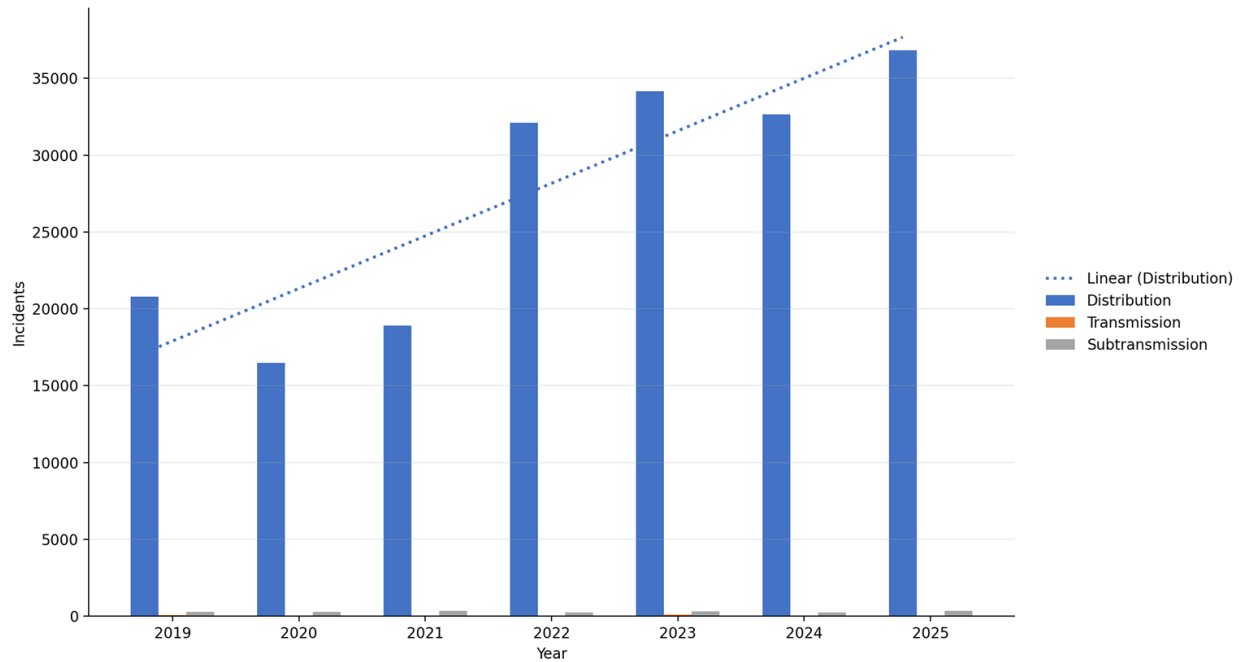
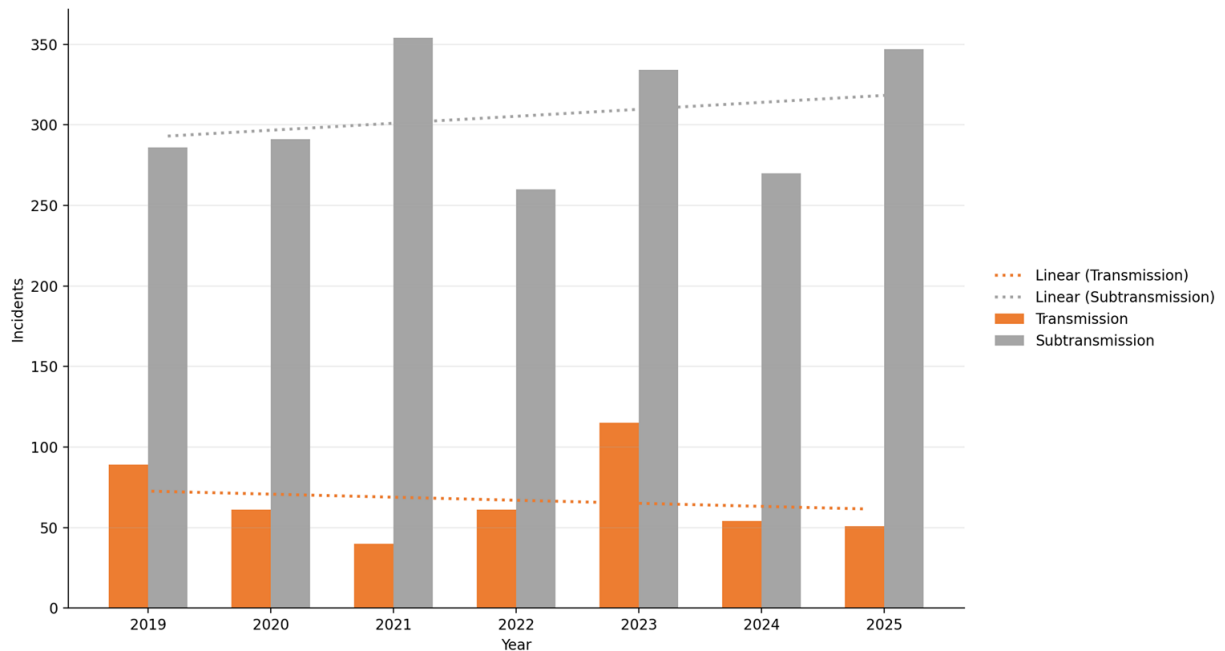


Figure 10-2: Outage Totals By Year for Transmission and Subtransmission
Outage Totals



The two figures above provide the following information:

- Distribution outage incidents far exceed both transmission and subtransmission outage incidents.
- Distribution outage totals are trending upward at an average increase of about 3,419 incidents per year (positive slope linear regression).
- Transmission outage totals are trending downwards at an average decrease of about 2 incidents per year (negative slope linear regression).
- Subtransmission outage totals are trending upward at an average increase of about 4 incidents per year (positive slope linear regression).

10.1.3.3 Causes Associated With Outages

In addition to tracking outages within HFTDs, LADWP tracks the respective causes associated with outages, including:

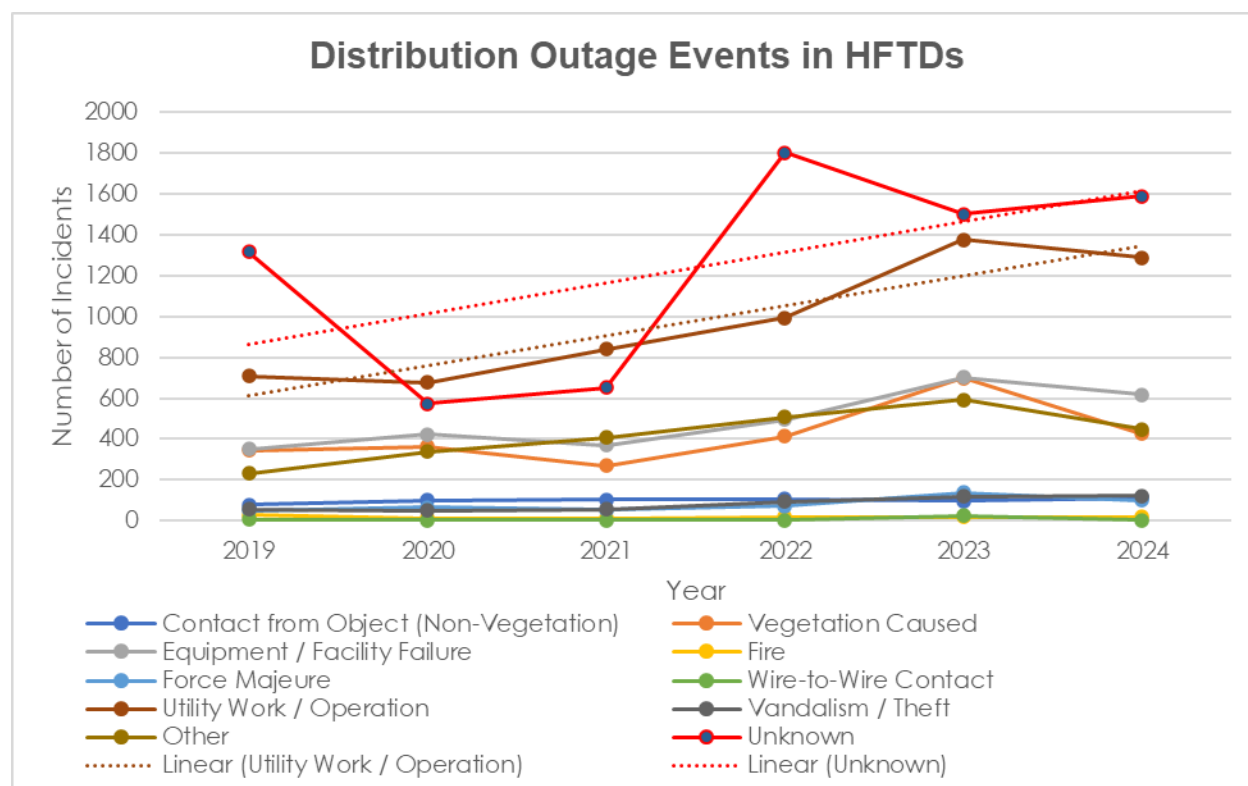
- Contact from Object (Non-Vegetation)
- Vegetation Caused
- Equipment/Facility Failure
- Fire (Non-LADWP Ignition)
- Force Majeure (Excluding Fire)
- Wire-to-Wire Contact
- Contamination
- Utility Work/Operation
- Vandalism/Theft
- Other
- Undetermined

Outcome Metrics on the breakdown of causes associated with outages within HFTDs during calendar years 2019 to 2024 are shown in Appendix D, “LADWP Metrics,” for the following:

- Distribution – Figures D-1a through D-1f
- Subtransmission – Figures D-2a through D-2f
- Transmission – Figures D-3a through D-3f

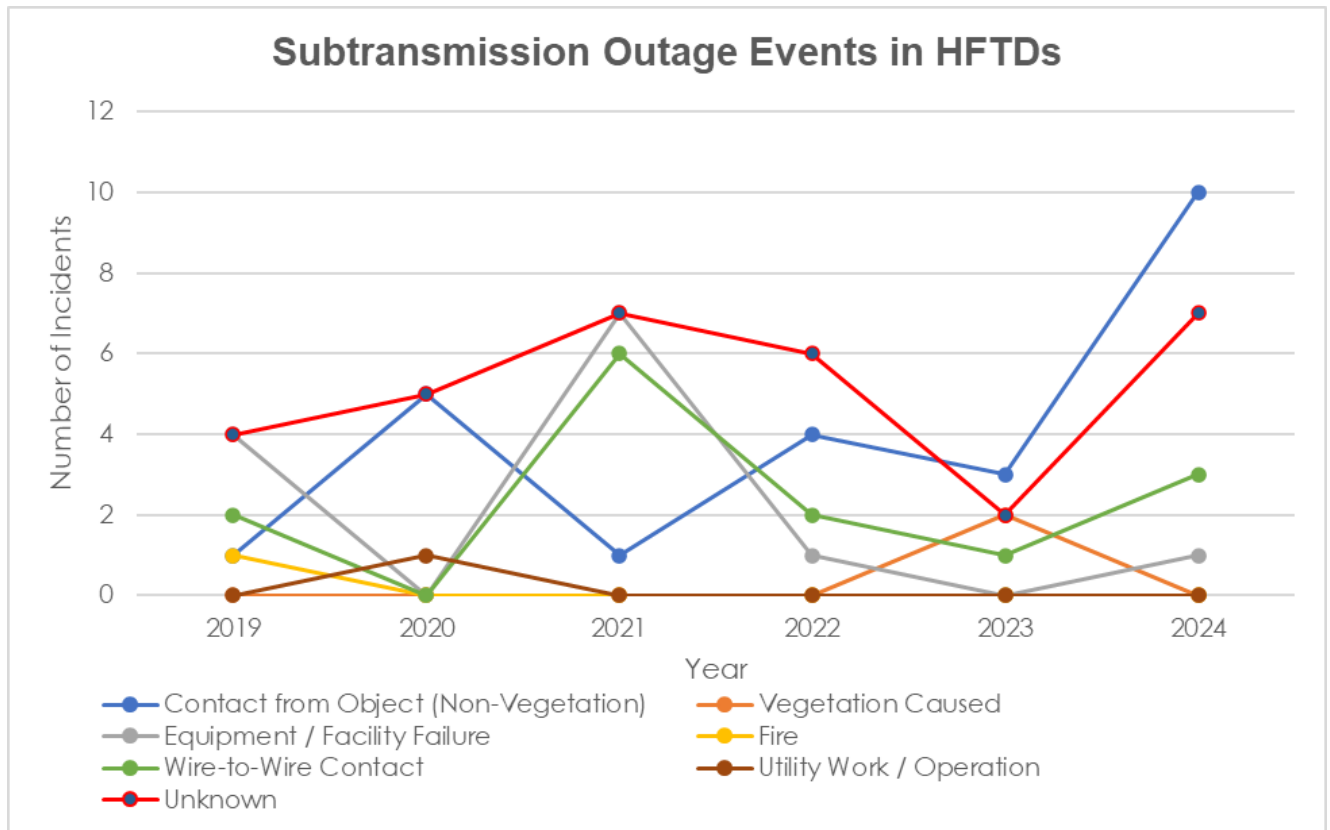
Using the data that supports the above-referenced figures (i.e., pie charts in Appendix D), the number of incidents triggered by each outage cause during calendar years 2019 to 2024 was also graphed and examined for trends. The figures provided below illustrate such examples.

Figure 10-3: Distribution Outage Events in HFTDs



The figure above provides the following information:

- A high proportion of distribution outage causes are undetermined.
- Distribution outage event types with significant sample sizes all exhibit positive trend lines, but this is largely due to the positive trend line associated with outage totals for the distribution system, as shown in Figure 10-1.
- The percentage of the total outages for each outage event type exhibits generally flat trend lines (i.e., the percentage of each distribution outage event type relative to total outages does not change appreciably on a year-to-year basis).

Figure 10-4: Subtransmission Outage Events in HFTDs

Due to low sample sizes in the subtransmission outage data, identifying meaningful trends is not feasible.

A high proportion of outages caused by unknown factors are common among each of the systems; distribution, subtransmission, and transmission. This emphasizes the need for better grid visibility. This may be achieved through LADWP's grid modernization programs like substation automation and advanced metering efforts. These tools allow for better outage tracking, investigation, and management.

10.1.4 Reliability Metrics

In addition to the Outcome Metrics provided, LADWP is also tracking its reliability performance indices such as the System Average Interruption Duration Index (SAIDI) and System Average Interruption Frequency Index (SAIFI). These indices track the average interruption duration for each customer served and the number of interruptions that a customer experiences on average, respectively.

To calculate reliability performance indices, LADWP incorporates the Outcome Metrics and other outage risk factors with IEEE 1366 industry standard system reliability reporting for both HFTD and non-HFTD service territories.

Tracking SAIDI and SAIFI values allows LADWP to improve the reliability of its grid. LADWP's SAIDI and SAIFI values are compared with the California large Investor-Owned Utility (IOU) average, which includes Southern California Edison, Pacific Gas and Electric, and San Diego Gas and Electric, from 2018-2023 and are shown in Figure D-4a and Figure D-4b of Appendix D, "LADWP Metrics." LADWP's SAIDI and SAIFI values have consistently remained comparable to its IOU peers.

10.1.5 Performance Metrics

Performance Metrics describe actions that are intended to reduce the risk of utility-caused wildfires. These Performance Metrics include inspection and vegetation management data for LADWP's distribution and transmission systems, as well as PSRP replacement metrics.

The output of these Performance Metrics is evaluated to determine potential improvements to LADWP's construction standards and for infrastructural and operational needs. Tracking Performance Metrics allows LADWP to pinpoint trends in outage causes and their associated risks, thus allowing LADWP to efficiently reduce risk events.

10.1.5.1 Inspection and Vegetation Management Metrics

LADWP continuously prioritizes its preventive and mitigation activities for operations based on the output of these metrics. Performance Metrics could also be used to re-evaluate LADWP's vegetation management program, inspection and maintenance programs, and future potential projects.

These Performance Metrics include the following:

- Distribution Patrol and Detailed Inspections
- Transmission Patrol and Detailed Inspections
- Routine Vegetation Management

The Performance Metrics data reveal that LADWP completed 100% of its routine vegetation management inspections.

The frequency of routine inspections is:

- Vegetation management inspections (once per year in non-HFTDs and twice per year in HFTDs)
- Distribution patrol inspections (once per year)
- Distribution detailed inspections (once every three years for underground structures and once every five years for overhead and pad-mount structures)

- Transmission patrol inspections (twice per year)
- Transmission detailed inspections (every 10 years).

10.1.5.2 Replacement Metrics

In addition to LADWP's inspection and vegetation management metrics, LADWP also tracks the replacement goals and actuals for specific assets by fiscal year. These include the following assets replaced within and outside HFTDs:

- Poles
- Crossarms
- Transformers
- Conductor Mileage

These PSRP metrics from Fiscal Year 2018-19 through Fiscal Year 2023-24 are shown in Appendix D, "LADWP Metrics," Figures D5-a through D-5d.

Between fiscal years 2018-2024, LADWP replaced the following quantities of assets in its HFTDs as part of its PSRP:

- 5,478 Poles
- 10,886 Crossarms
- 2,277 Transformers
- 25.58 Miles of Conductor

During this period, replacement rates for poles and crossarms within HFTDs have been relatively consistent each fiscal year, while transformer and conductor mileage replacement rates have increased significantly within the latter half of the 2018-2024 fiscal year range.

Reflecting LADWP's increasing emphasis on asset maintenance within HFTDs, more than half of PSRP transformer replacements in HFTDs between fiscal years 2018-2024 occurred solely within FY 2023-2024. Additionally, the conductor mileage replacement rate in HFTDs increased from an average of 0.55 miles in the first half of the reporting period to an average of nearly 8 miles in the second half.

10.2 Impacts of Metrics on WMP

LADWP data gathering for its WMP metrics is relatively limited, covering only the last few years. However, as LADWP's data collection history becomes more robust, LADWP will be able to identify any areas of its operations and service territory that are disproportionately impacted. LADWP plans to use the aforementioned metrics to evaluate the WMP and investigate potential WMP improvements.

The Distribution and Subtransmission Outcome Metrics shown in Table D-2 of Appendix D, "LADWP Metrics," reveal that a majority of distribution-level and subtransmission-level outages

occur outside of the CPUC-designated HFTDs. This is because only 21% of LADWP's service territory is within HFTDs. This data affirms LADWP's approach to its wildfire mitigation programs and strategies in promoting a safe and reliable grid.

The Transmission Outcome Metrics presented in Table D-2 of Appendix D, "LADWP Metrics," show a more even distribution of outages occurring within and outside of the CPUC-designated HFTDs. This is because LADWP's transmission system spans a larger area but experiences far fewer outages compared to its distribution and subtransmission systems.

The Reliability Metrics data set indicates that LADWP operates and maintains its system reliably compared to the California large IOU average. This data affirms LADWP's approach of operating and maintaining its system to monitor the resiliency of the electric grid.

10.3 Processing WMP Updates and WMP Monitoring

LADWP will update the WMP as its wildfire mitigation strategies evolve over time. LADWP will review and update the WMP as needed, with comprehensive revisions performed biennially. As part of this review process, LADWP's internal groups meet under the LADWP Wildfire Safety Risk Governance framework, including various subject matter experts, to review specific WMP Information.

The Wildfire Safety Risk Governance Director Steering Committee and Executive Council are forums for LADWP management to set annual WMP priorities and review WMP changes prior to implementation. The Policy & Regulatory subcommittee manages revisions and works with the Strategy & Governance team to address all concerns.

The WMP is subsequently approved by a subset of the LADWP Executive Leadership Team, including the Interim General Manager, prior to being filed with the Board of Water and Power Commissioners. Final WMP updates are presented to LADWP's Board and the public for additional feedback and submitted to the California Wildfire Safety Advisory Board in accordance with Senate Bill 901 and Assembly Bill 1054.

10.4 Independent Evaluation and Internal Auditing

Public Utilities Code section 8387(c) requires LADWP to contract with a qualified independent evaluator experienced in assessing the safe operation of electrical infrastructure to review and assess WMP comprehensiveness. The independent evaluator must issue a report that is posted to LADWP's website. This report will also be presented to LADWP's Board at a public meeting. The most recent Independent Evaluator report is available for public review at the following link: <https://www.ladwp.com/wildfireplan>.

LADWP will also conduct internal audits involving WMP implementation, including relevant activities related to its transmission and distribution systems.

10.5 Continuous Improvement

LADWP annually reviews and, if necessary, adjusts practices to lower the risk of wildfire caused by LADWP electrical lines. The Regulatory Compliance Group oversees, monitors, and reviews

the WMP; resolves WMP deficiencies; and addresses any potential performance challenges. All responsible persons and stakeholders listed in Section 3.0, “LADWP Organization and Responsible Persons,” are empowered to identify issues or corrective actions to support WMP continuous improvement.

As part of the Performance Tracking & Evaluation subcommittee’s goals, LADWP aims to continuously evaluate the various levels of the wildfire safety governance framework to identify and implement improvements. As the Strategy & Governance team provides and updates program vision, the Performance Tracking & Evaluation team aims to map processes and track progress, especially as they pertain to WMP commitments. Additionally, the Performance Tracking & Evaluation team will develop and implement, if necessary, tools and software to establish standardized milestone reporting. These efforts may then culminate in enhanced executive dashboards to deliver real-time insights, including key performance or risk indicators.

The Office of Emergency Management (OEM) plays a key role in supporting continuous improvement by evaluating past incidents, incorporating any significant insights from them, and incorporating them into future planning, training, and operations. Following incidents, exercises, and planned events, OEM facilitates After-Action Reviews (AARs) and develops Improvement Plans (IPs) to identify strengths, areas for improvement, and corrective actions. Recommendations are coordinated across internal departments and external partners to facilitate implementation of corrective actions, track them to completion, and incorporate them into plans, procedures, and future operational activities.

OEM also leads ongoing preparedness efforts through internal and external workshops, training, tabletop exercises, functional exercises, and coordination meetings with local, state, federal, and utility partners. These engagements provide opportunities to validate plans, evaluate capabilities, strengthen coordination, and refine decision-making processes before an incident occurs. Feedback received through these activities is incorporated into emergency plans, operational procedures, and program improvements, helping LADWP to strengthen its wildfire mitigation efforts, emergency preparedness, and overall organizational resilience.

11.0 Revision History

Date	Revision
12/09/2019	Initial Version.
04/17/2020	Updated Section 2.5: Description of DO responsibilities Updated Section 3.4: OH transmission mileage in Tables 1, 2, and 3 Updated Section 4.5: PSRP replacements in Graphs 1 through 4 Updated Section 4.5: PSRP budget numbers in Figures 3 through 6
04/21/2021	Updated Section 2: Roles and Responsibilities Updated Section 3.3: Wildfire Risks and Risk Drivers Associated with Design, Construction, Operation, and Maintenance Updated Section 3.4: LADWP Asset Information Updated Section 4.3: Vegetation Management Updated Section 4.6: Workforce Training Updated Section 4.5: PSRP graphs and figures Updated Section 4.7: Operations and Protocols Updated Section 6: Community Outreach and Public Awareness
05/11/2022	Added Section 1.3: Context Setting Information Added Section 1.4: Cross Reference to Statutory Requirements Updated Section 2: Roles and Responsibilities Updated Section 4.2: Design, Construction Standards, and Infrastructure Updated Section 4.6: Workforce Training Updated Section 4.7: Operations and Protocols Updated Section 6: Community Outreach and Public Awareness
03/21/2023	Added Section 2.4: Chief Operating Officer (COO) Updated Section 2.5: LADWP Power System Executive Office Updated Section 2.6: LADWP Power System Transmission and Distribution Updated Section 2.12: LADWP Office of Emergency Management Updated Section 3.1: Wildfire Risks and Risk Drivers Associated with Topographic and Climatological Risk Factors Updated Section 3.4: LADWP Risk Assessment Updated Section 4.2: Design, Construction Standards, and Infrastructure Updated Section 4.4 Inspection and Maintenance Updated Section 7.1: Metrics and Assumptions for Measuring Plan Performance Updated Section 7.2: Impacts of Metrics on Plan Added Appendix B: LADWP Metrics Added Appendix C: Definitions
05/08/2024	Updated Section 2: Roles and Responsibilities Updated Section 4.3: Vegetation Management Updated Section 4.4: Inspection and Maintenance Updated Section 4.6: Workforce Training

Date	Revision
	Updated Section 4.7: Operations and Protocols Updated Section 7.3: Monitoring and Auditing the Plan Updated Appendix B: LADWP Metrics
04/10/2025	Added Section 1.5: Additional Clarifications Updated Section 2. Roles and Responsibilities Updated Section 4.3: Vegetation Management Updated Section 4.7: Operations and Protocols Updated Section 7.2: Impacts of Metrics on Plan Updated Appendix B: LADWP Metrics Updated Appendix C: Definitions
08/26/2026	<i>Substantial reconstruction of WMP in 2026</i> New summary of Tables and Figures provided in the Table of Contents Updated Section 1.0: Executive Summary, now providing forward-looking overview of LADWP's state of wildfire risk management; context-setting data originally located in this section has moved to Section 4.0 Overview of Service Territory New Section 2.0: Overview illustrates the statutory requirements, LADWP's strategic objectives, and targeted objectives requested by the Wildfire Safety Advisory Board Updated Section 3.0: Contains descriptions of Responsible Persons, as previously presented in the 2025 WMP's Section 2.0, however expands on new core functions of the Offices of Risk and Compliance, Emergency Management, and Enterprise Strategy & Sustainability New Section 4.0: Overview of Service Territory contains WSAB-requested statistical information, previously featured in Section 1.0, and describes LADWP's landmark wildfire events of 2025 New Section 5.0: Wildfire Risk Management Program features the strategic design of LADWP's inaugural Enterprise Risk Management division and its impact on the WMP, now aligned toward ISO 31000 principles Updated Sections 6.0 and 7.0: Wildfire Risk Control and Mitigation Programs, respectively, expand upon what was formerly Section 4.0, further demonstrating the maturation of LADWP's risk treatment programs New Section 8.0: Emergency Management, illustrating LADWP's rapid and comprehensive expansion of plans and programs associated with Emergency Management

Date	Revision
	Updated Section 9.0: Community Outreach and Public Awareness, what was formerly Section 6.0, now features Customer Education and Outreach New Section 10.0: Metrics, Monitoring, and Continuous Improvement consolidates what was formerly Sections 7.0 and 8.0 Updated Section 11.0: Revision History, formerly Section 10.0 Updated Section 12.0: Appendices, formerly Section 11.0, now expanding cross-references to prior WMP versions, expanded PSRP metrics, a new acronym dictionary, and expanded references/citations

12.0 Appendices

Appendix A – WMP Version Cross-Reference Table

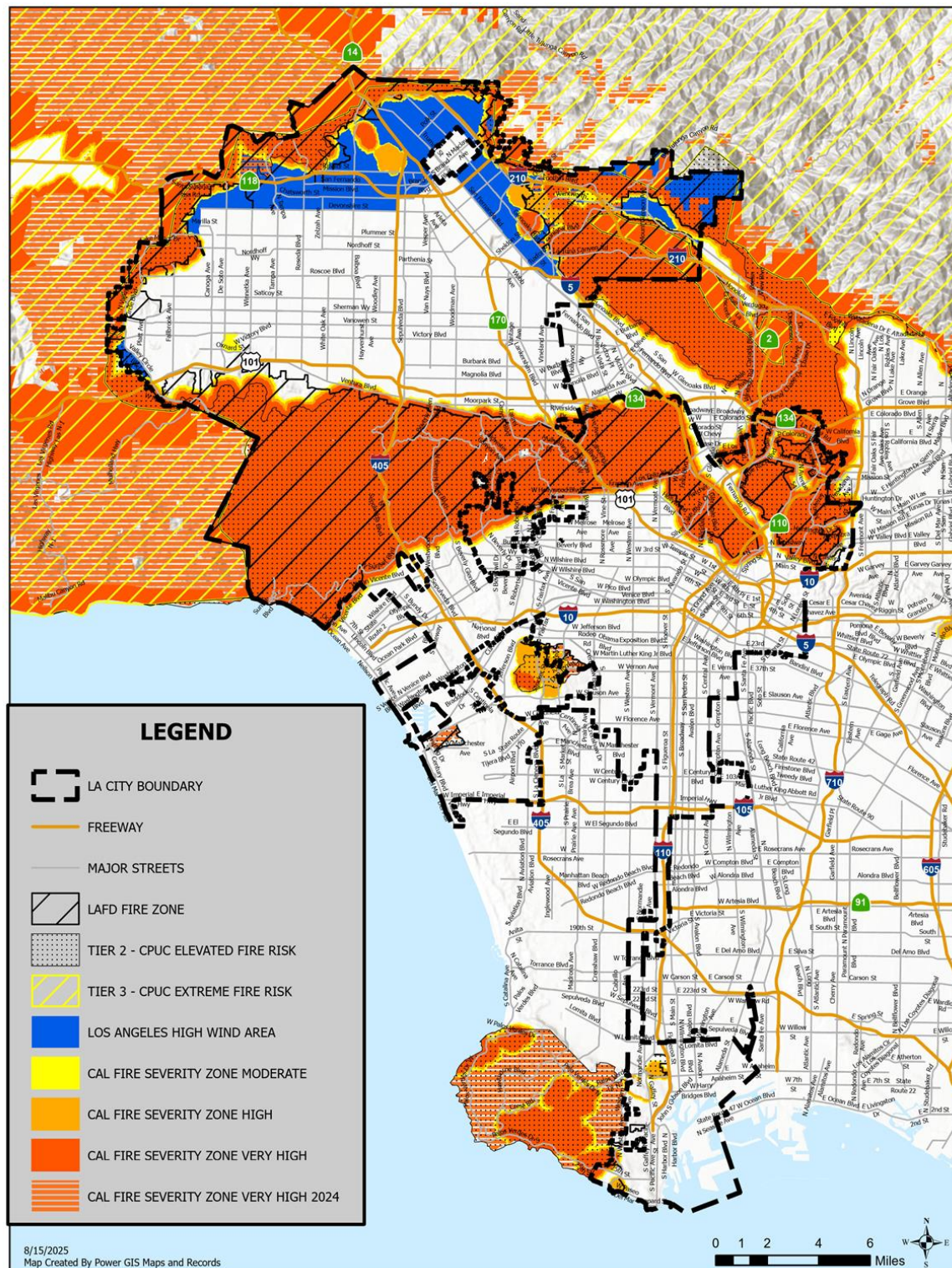
Table A-1: Cross-Reference to WMP Issued July 2025

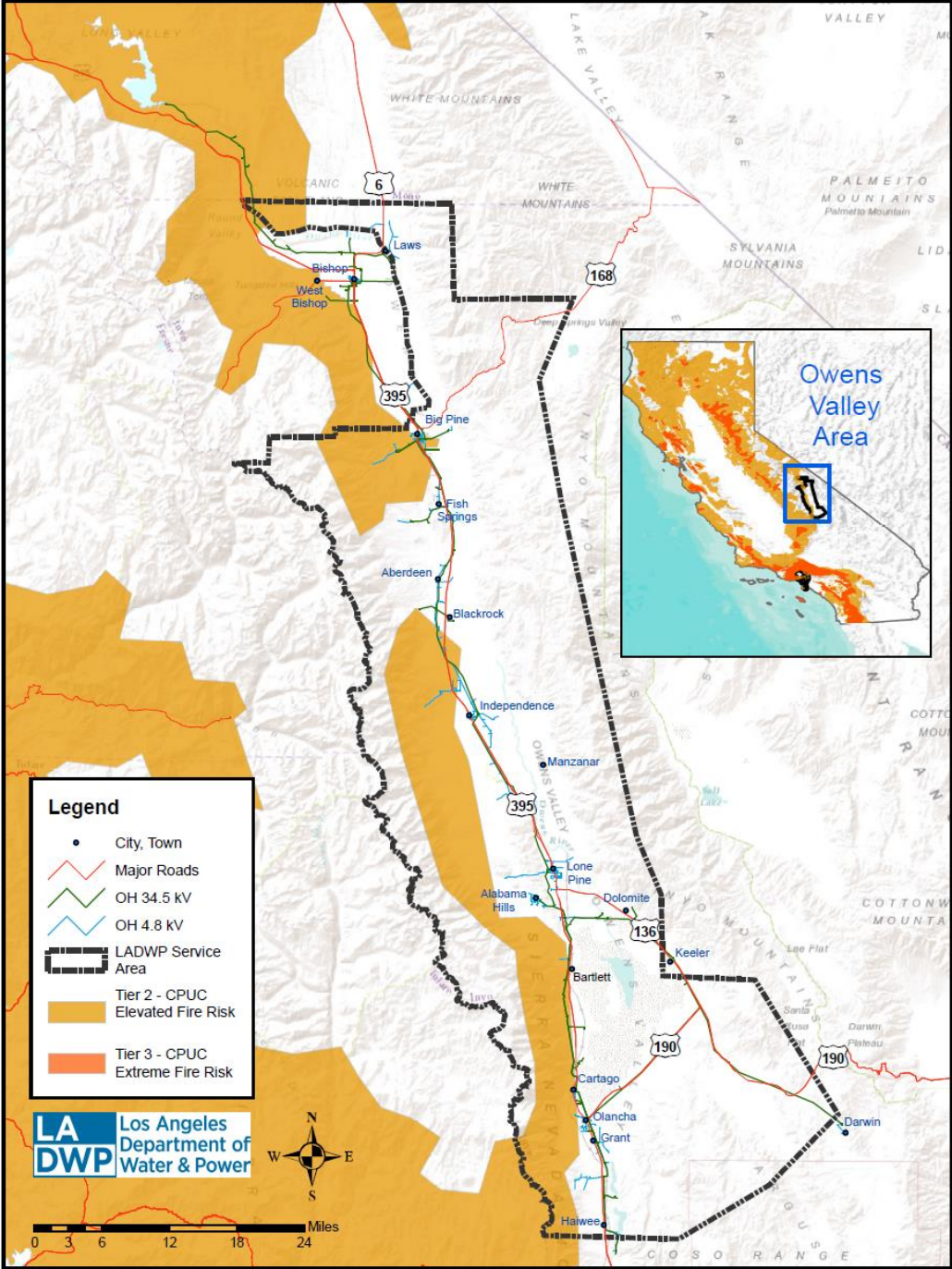
2025 WMP Section	2025 WMP Section Title	Section in 2027-2028 WMP
1.1.	Policy Statement	1.2
1.2.	The Wildfire Mitigation Plan	1.1, 1.3, 1.3.1, 1.3.2, 3.1
1.3.	Context Setting	4.1
1.4.	Cross Reference to Statutory Requirements	2.4
1.5.	Additional Clarifications	Not Applicable
2.	Roles and Responsibilities	3.0
2.1.	LADWP Wildfire Organizational Chart	3.0, Figure 3-1
2.2.	Board of Water and Power Commissioners	3.1
2.3.	Chief Executive Officer and Chief Engineer	3.2
2.4.	Power System Executive Office	3.3
2.5.	Water Executive Office	3.4
2.6.	LADWP Power Transmission and Distribution Division (PTD)	3.3.1
2.7.	LADWP Power Construction and Maintenance Division (PCM)	3.3.2
2.8.	LADWP Power Supply Operations Division (PSO)	3.3.3
2.9.	LADWP Power Energy Control Center and Grid Reliability Division	3.3.4
2.10.	LADWP* Power Engineering Division (PED)	3.3.5
2.11.	LADWP Advanced Technologies Infrastructure Division	3.3.6

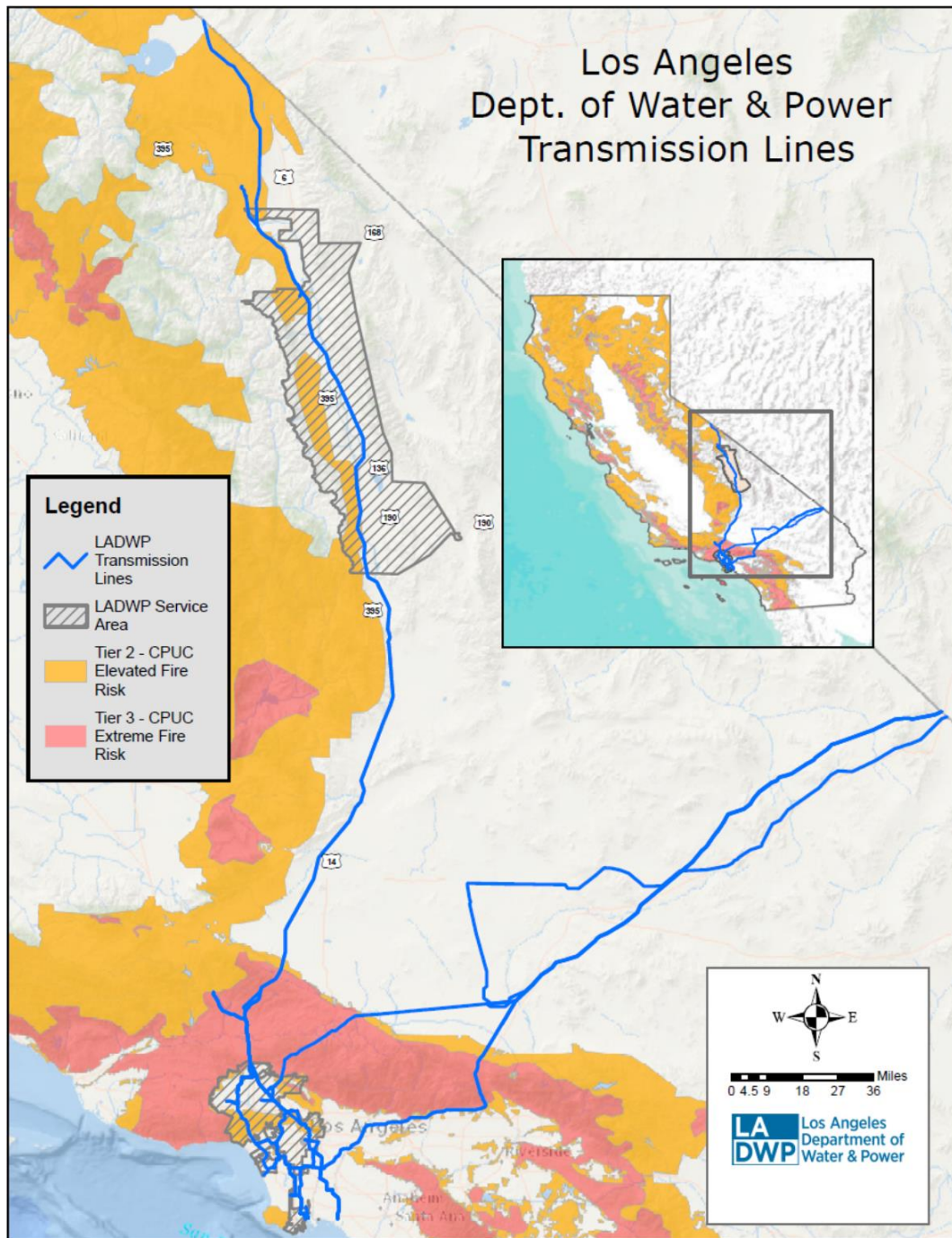
2025 WMP Section	2025 WMP Section Title	Section in 2027-2028 WMP
2.12.	LADWP Regulatory Compliance Division	3.5.2
2.13.	LADWP Water System	3.4, 4.3
2.14.	LADWP Office of Emergency Management (OEM)	3.6
2.15.	LADWP Corporate Strategy and Communications	3.7
2.16.	LADWP Customer Service Division (CSD)	3.7.1
3.	Wildfire Risks and Risks Drivers	5.0
3.1.	Wildfire Risks and Risk Drivers Associated with Topographic and Climatological Risk Factors	5.1
3.2.	CPUC Designated Fire Threat Districts	4.2
3.3.	Wildfire Risks and Risk Drivers Associated with Design, Construction, Operation, and Maintenance Risk Factors	5.1
3.4	Risk Assessment	5.2
4.	Wildfire Preventive Strategies	6.0, 7.0
4.1.	High Fire Threat District	4.2, 5.3.1
4.2.	Design, Construction Standards, and Infrastructure	7.1
4.3.	Vegetation Management	6.4, 6.4.1 through 6.4.8, 6.5
4.4.	Inspection and Maintenance	6.1, 6.1.1 through 6.1.6
4.5.	Power System Reliability Program (PSRP)	6.2, 6.2.1 through 6.2.3
4.6.	Workforce Training	7.4, 7.4.1 through 7.4.3
4.7.	Operations and Protocols	7.2, 7.2.1 through 7.2.6

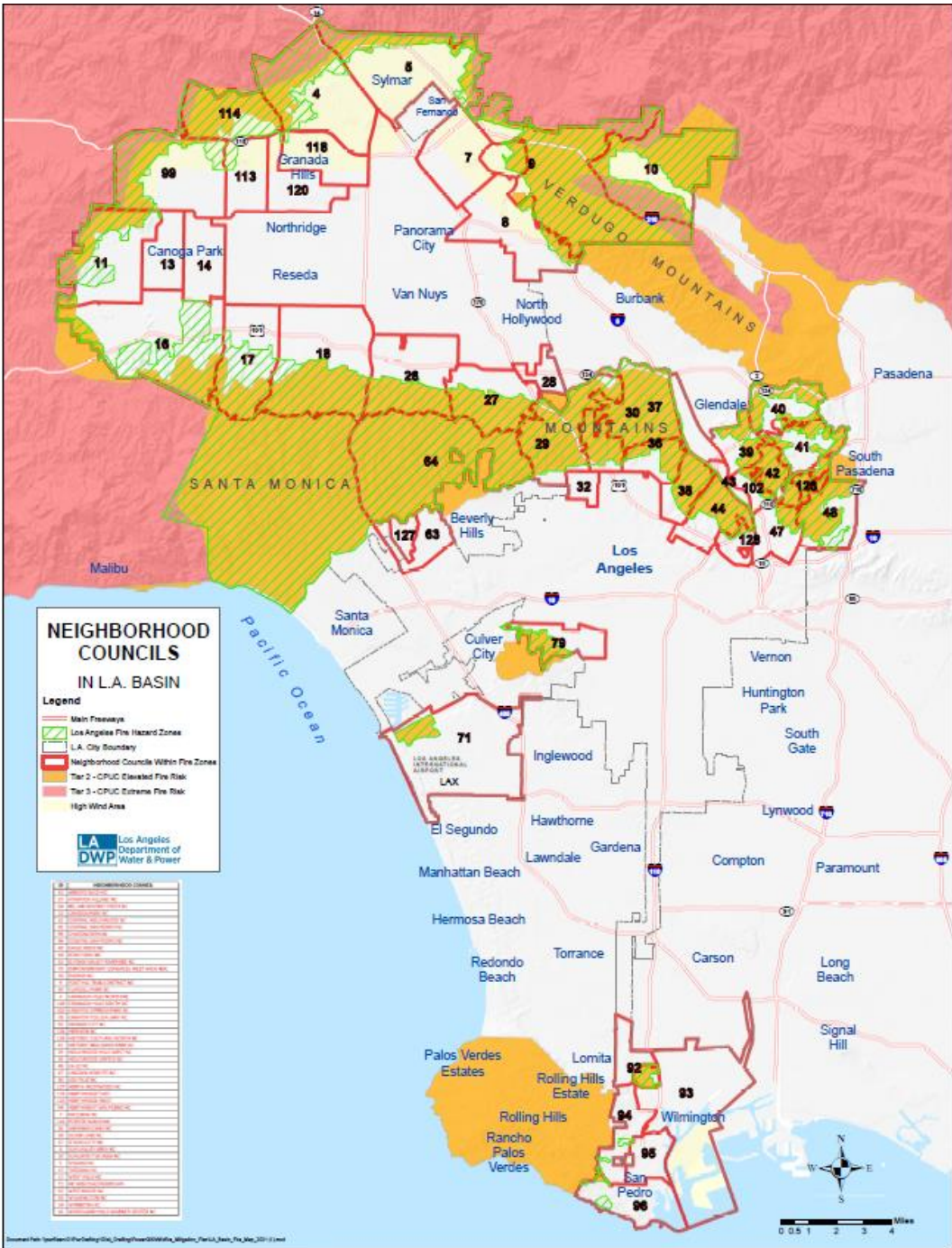
2025 WMP Section	2025 WMP Section Title	Section in 2027-2028 WMP
5.	Restoration of Service	8.11
6.	Community Outreach and Public Awareness	9.0, 9.1 through 9.5
7.	Evaluating the Plan	10.0
7.1.	Metrics and Assumptions for Measuring Plan Performance	10.1, 10.1.1 through 10.1.5
7.2.	Impacts of Metrics on Plan	10.2
7.3.	Monitoring and Auditing the Plan	10.3 & 10.4
7.4.	Identifying and Correcting Deficiencies in the Plan	10.3 through 10.5
8.	Independent Evaluator	10.4
9.	Conclusion	N/A
10.	Revision History	11.0
11.	Appendix A. LADWP Fire Threat Maps	Appendix B - LADWP Fire Threat Maps
11.	Appendix B. LADWP Metrics	Appendix D - LADWP Metrics
11.	Appendix C. Definitions	Appendix E -Terms and Definitions

Appendix B – LADWP Fire Threat Maps









Appendix C – Breakdowns of PSRP Budget Actuals (FY 2016-17 through FY 2024-25)

Figure C-1: PSRP Budget Actuals Breakdown for FY 2016-17

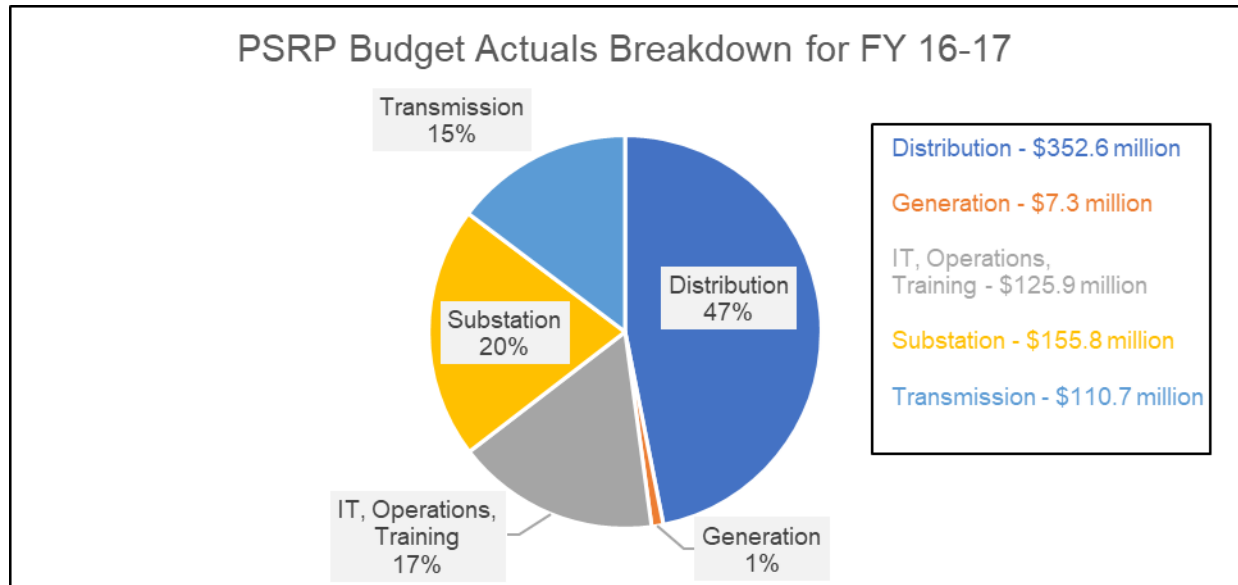


Figure C-2: PSRP Budget Actuals Breakdown for FY 2017-18

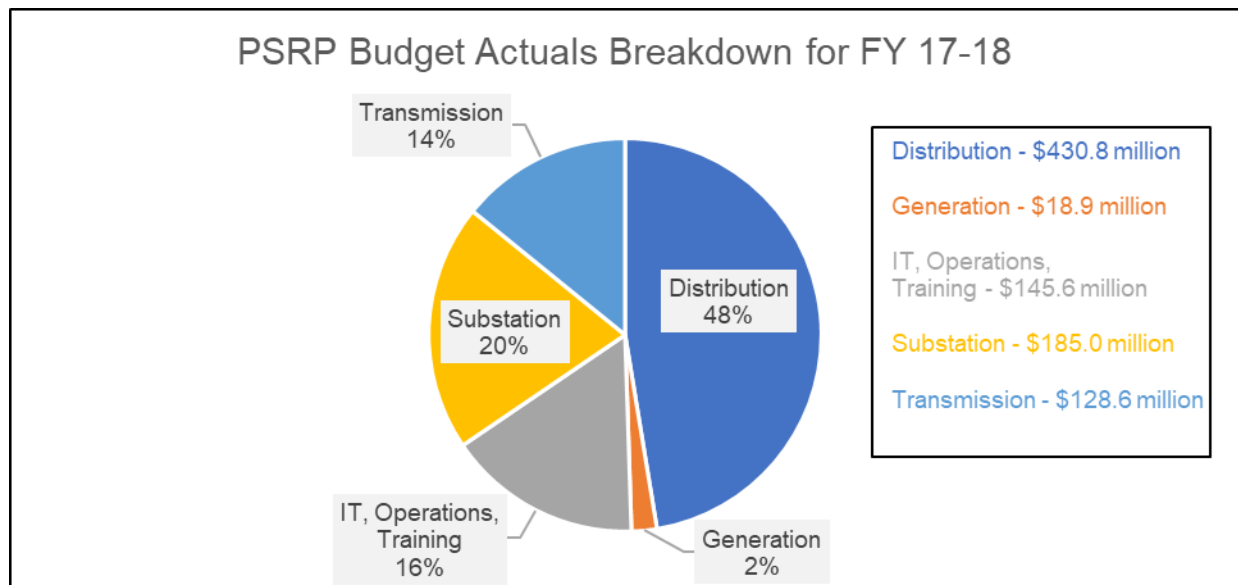


Figure C-3: PSRP Budget Actuals Breakdown for FY 2018-19

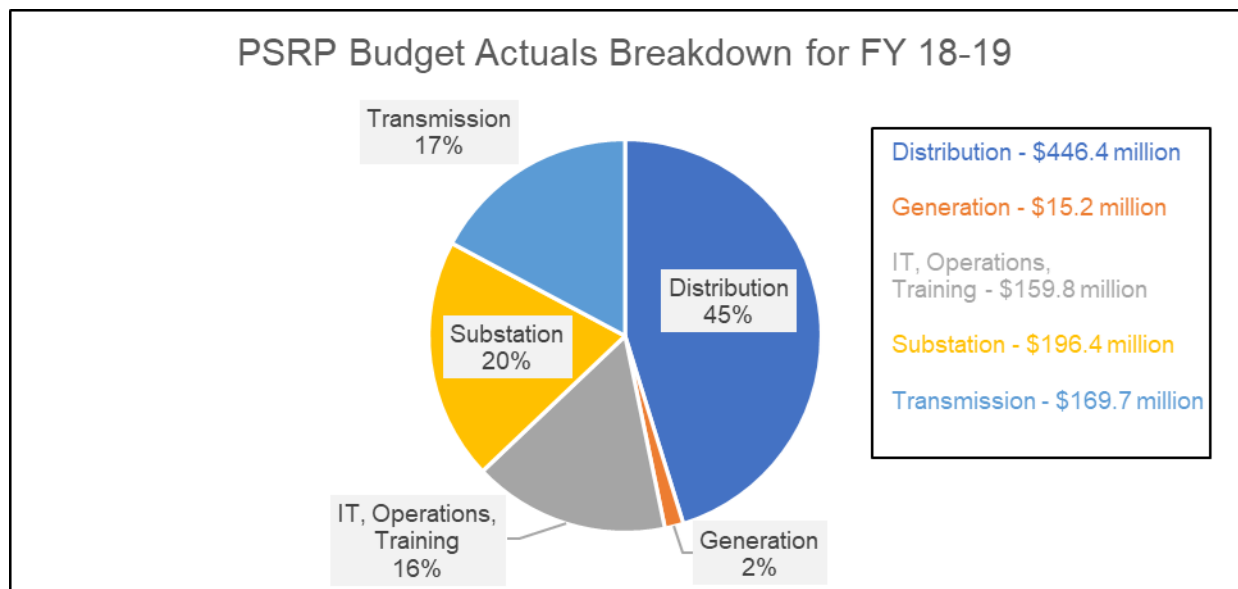


Figure C-4: PSRP Budget Actuals Breakdown for FY 2019-20

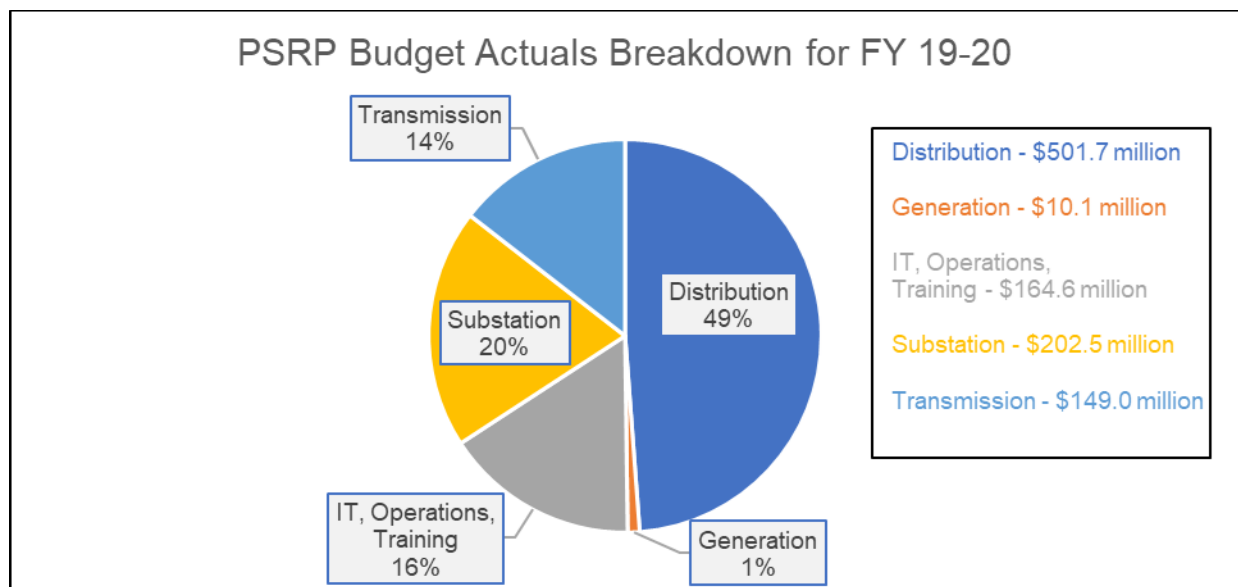


Figure C-5: PSRP Budget Actuals Breakdown for FY 2020-21

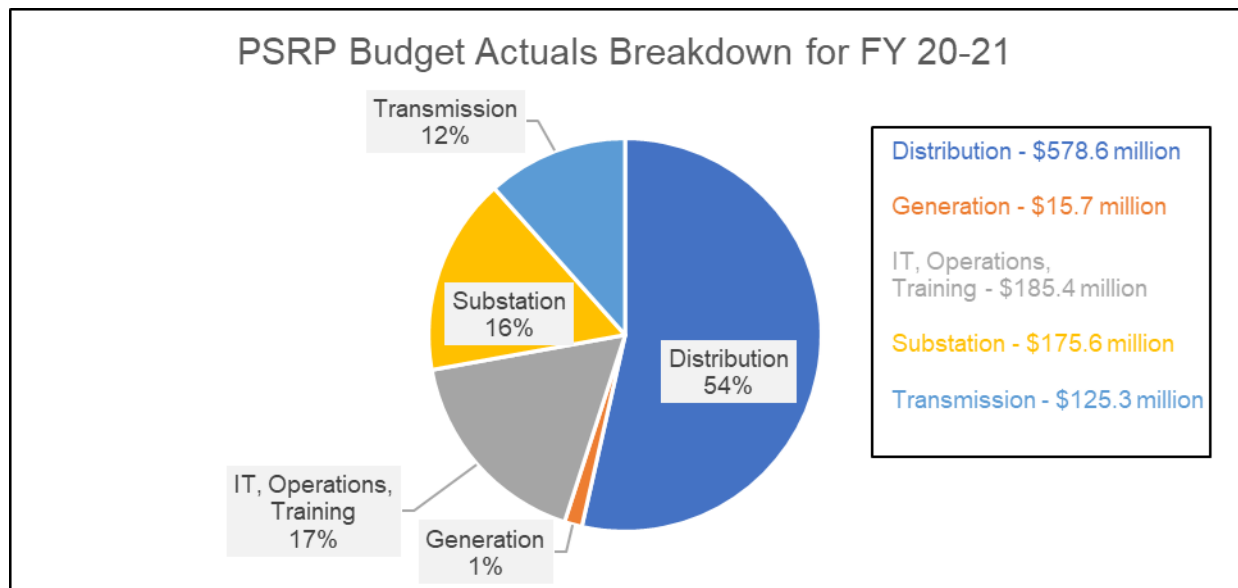


Figure C-6: PSRP Budget Actuals Breakdown for FY 2021-22

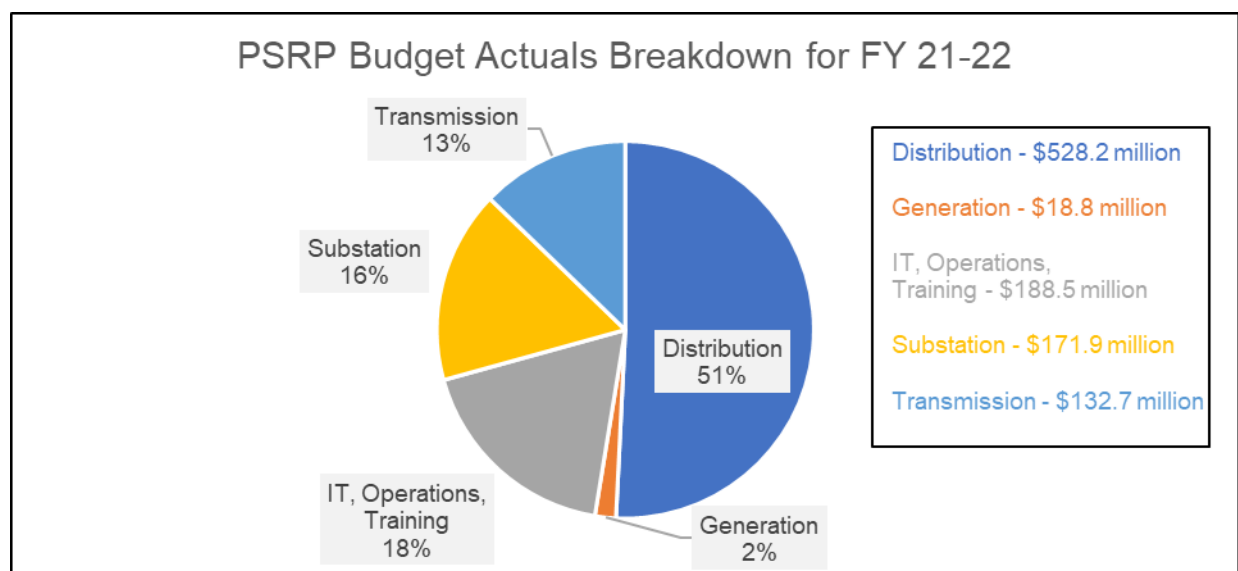


Figure C-7: PSRP Budget Actuals Breakdown for FY 2022-23

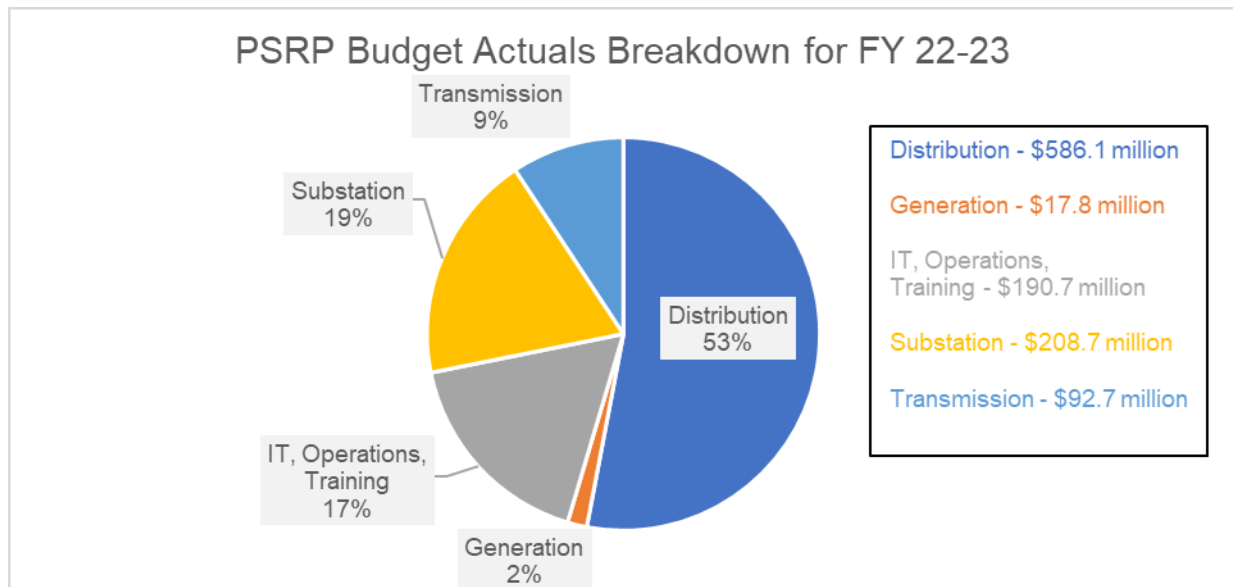


Figure C-8: PSRP Budget Actuals Breakdown for FY 2023-24

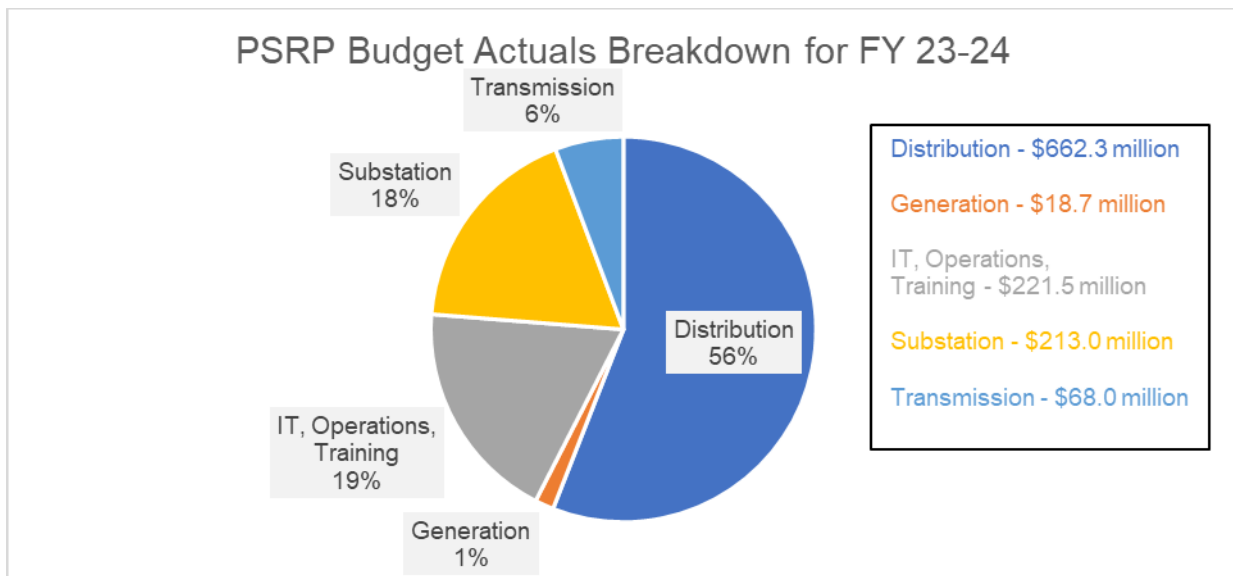
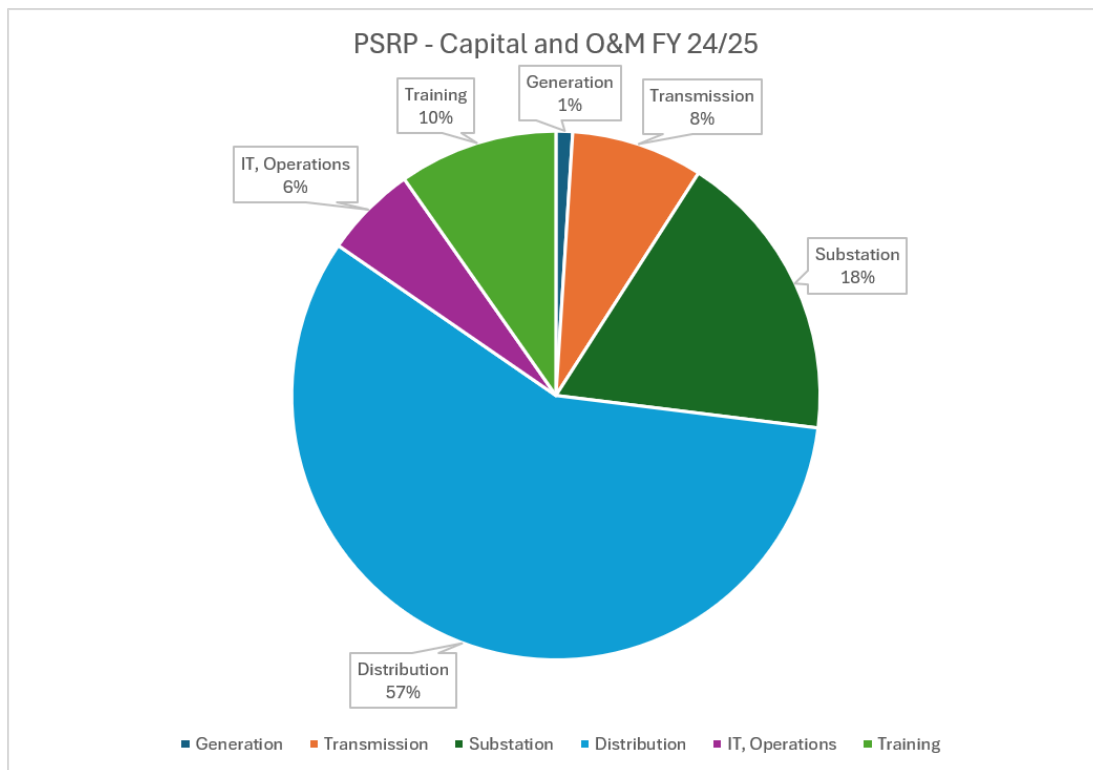


Figure C-9: PSRP Budget Actuals Breakdown for FY 2024-25



Appendix D – LADWP Metrics

Table D-1: Number of Red Flag Warnings and Red Flag Alerts¹⁶

Extreme Weather Type	2019	2020	2021	2022	2023	2024
Red Flag Warnings	0	24	27	12	2	39
Red Flag Alerts	4	2	5	5	3	4

Table D-2: LADWP Outage Percentages Within and Outside HFTDs

	Distribution		Subtransmission		Transmission	
	% of Outages Within HFTDs	% of Outages Outside HFTDs	% of Outages Within HFTDs	% of Outages Outside HFTDs	% of Outages Within HFTDs	% of Outages Outside HFTDs
2019	15%	85%	3%	97%	78%	22%
2020	15%	85%	3%	97%	58%	42%
2021	14%	86%	5%	95%	49%	51%
2022	14%	86%	4%	96%	54%	46%
2023	15%	85%	2%	98%	28%	72%
2024	14%	86%	5%	95%	47%	53%

Table D-3: LADWP's Distribution-level Line Clearance Tree Trimming in HFTDs

Distribution-level Line Clearance Tree Trimming in HFTDs		
	Number of Trees Patrolled	Number of Trees Trimmed
2021	125,720	80,249
2022	127,290	72,790
2023	315,770	152,890
2024	299,554	115,003
2025	245,592	103,479

¹⁶ Note that Los Angeles Fire Department Red Flag Alerts differ from the National Weather Service Red Flag Warnings and are specific to the City of Los Angeles.

Appendix D – LADWP Metrics (Continued)

Figure D-1a: Distribution Outage Breakdown in HFTDs (2019)

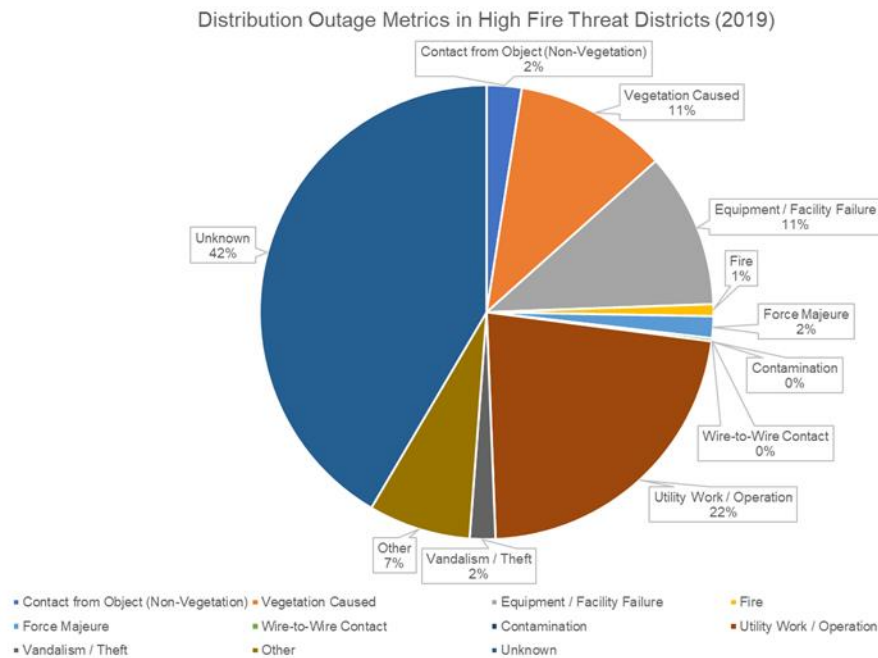
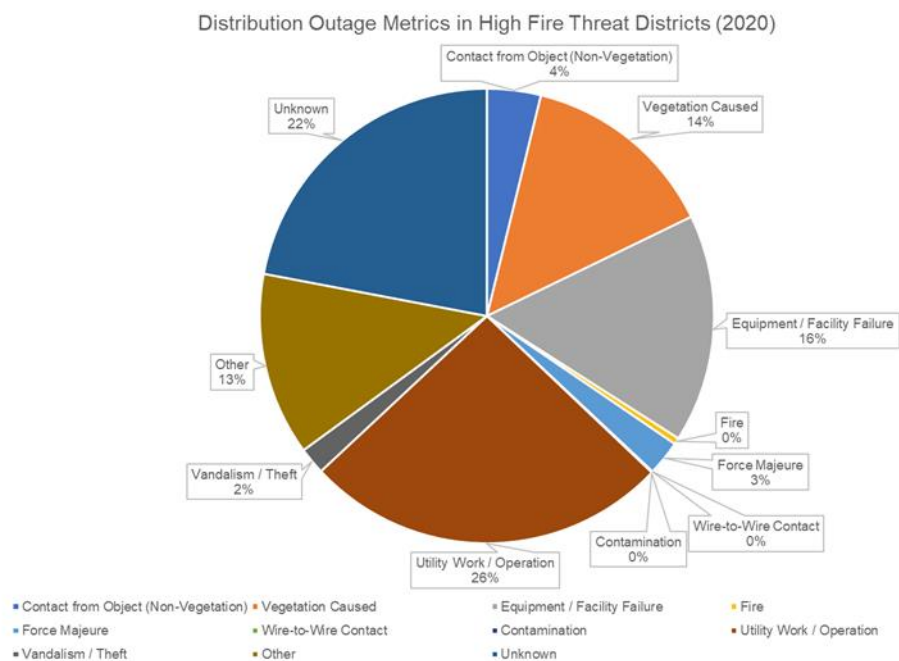


Figure D-1b: Distribution Outage Breakdown in HFTDs (2020)



Appendix D – LADWP Metrics (Continued)

Figure D-1c: Distribution Outage Breakdown in HFTDs (2021)

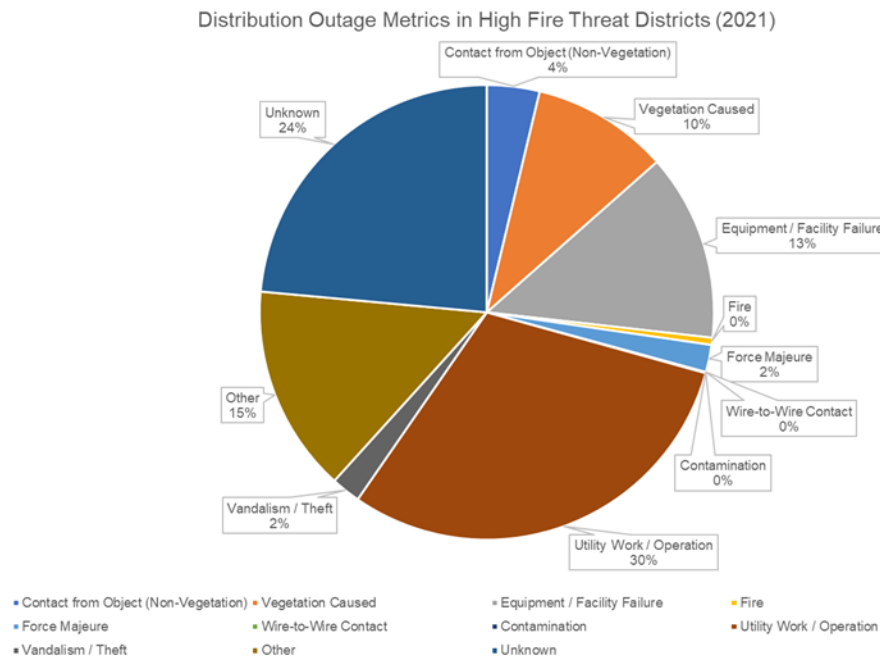
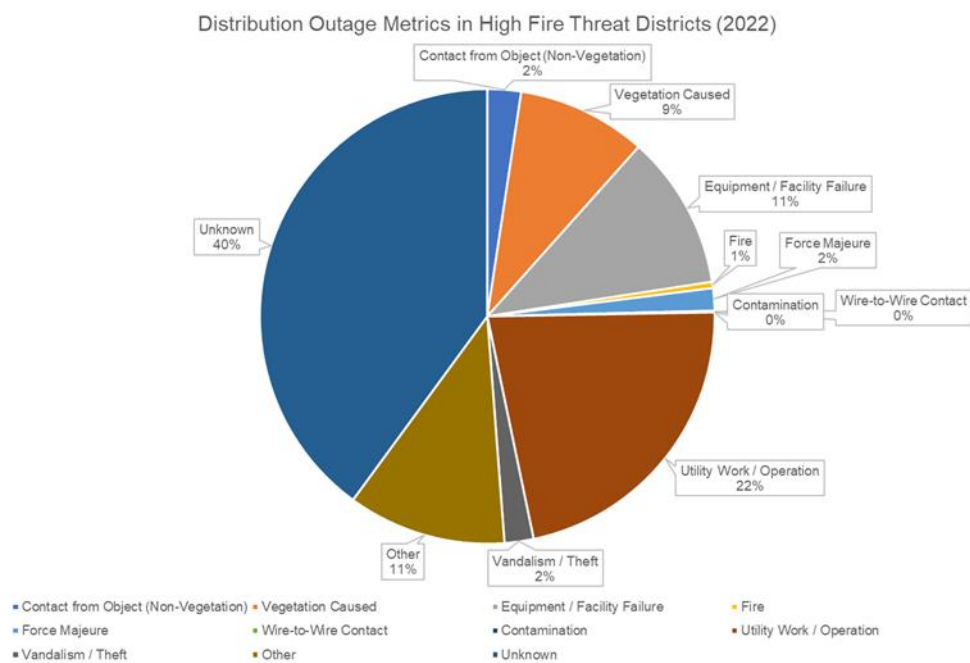


Figure D-1d: Distribution Outage Breakdown in HFTDs (2022)



Appendix D – LADWP Metrics (Continued)

Figure D-1e: Distribution Outage Breakdown in HFTDs (2023)

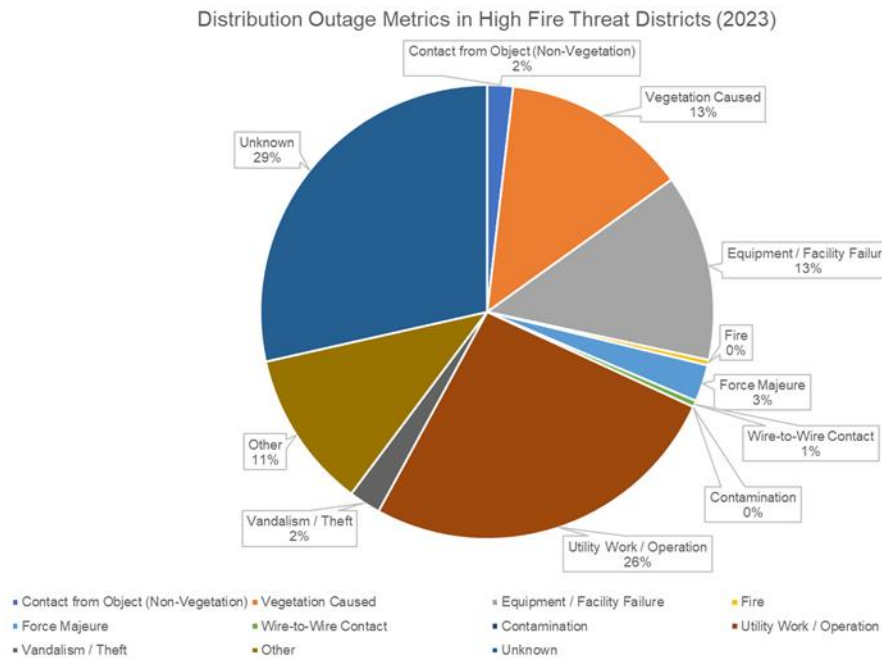
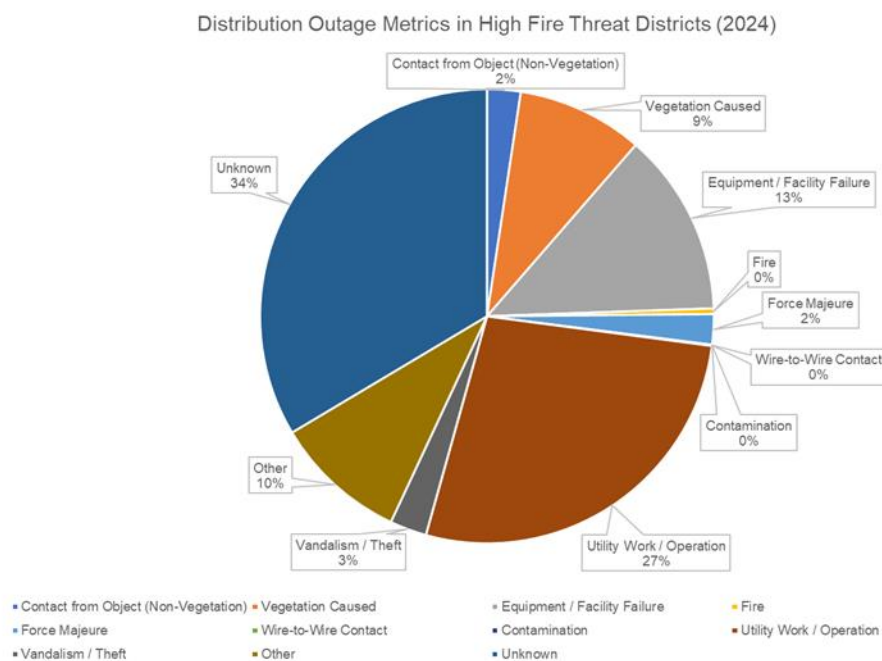


Figure D-1f: Distribution Outage Breakdown in HFTDs (2024)



Appendix D – LADWP Metrics (Continued)

Figure D-2a: Subtransmission Outage Breakdown in HFTDs (2019)

Subtransmission Outage Metrics in High Fire Threat Districts (2019)

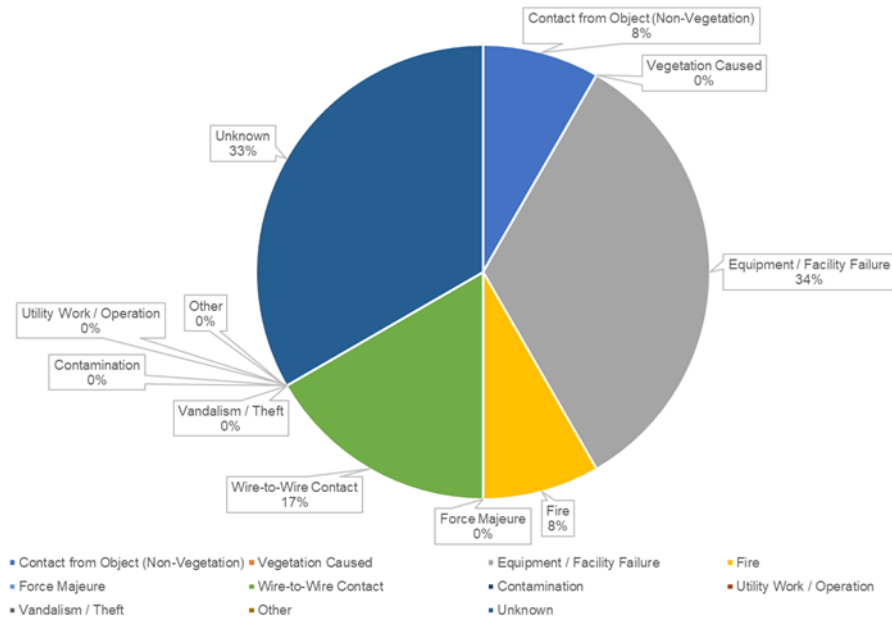
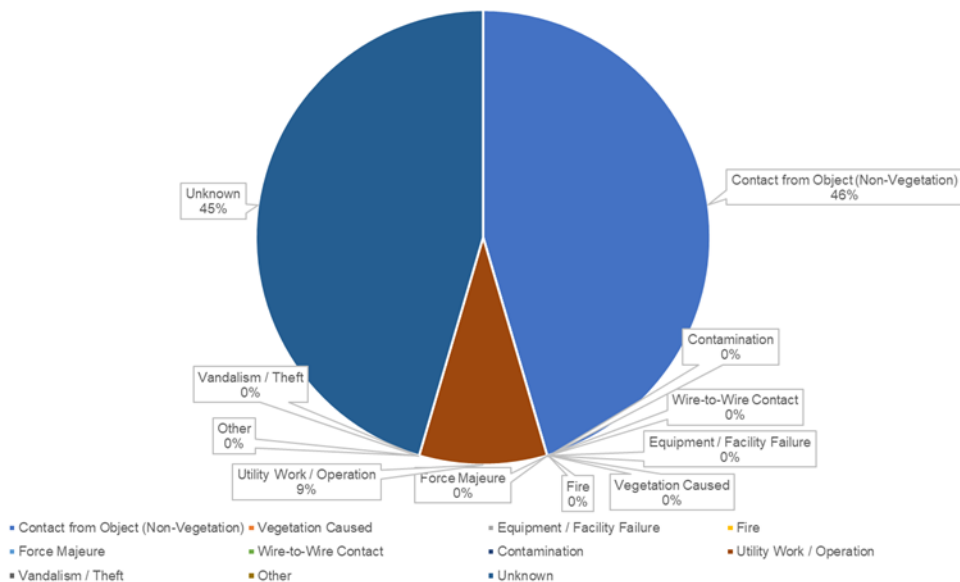


Figure D-2b: Subtransmission Outage Breakdown in HFTDs (2020)

Subtransmission Outage Metrics in High Fire Threat Districts (2020)



Appendix D – LADWP Metrics (Continued)

Figure D-2c: Subtransmission Outage Breakdown in HFTDs (2021)

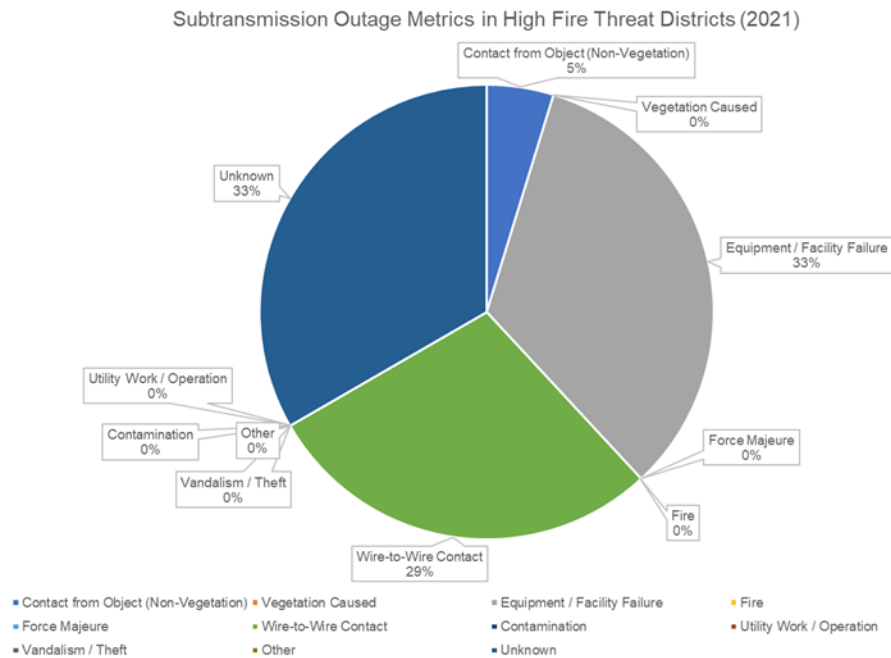
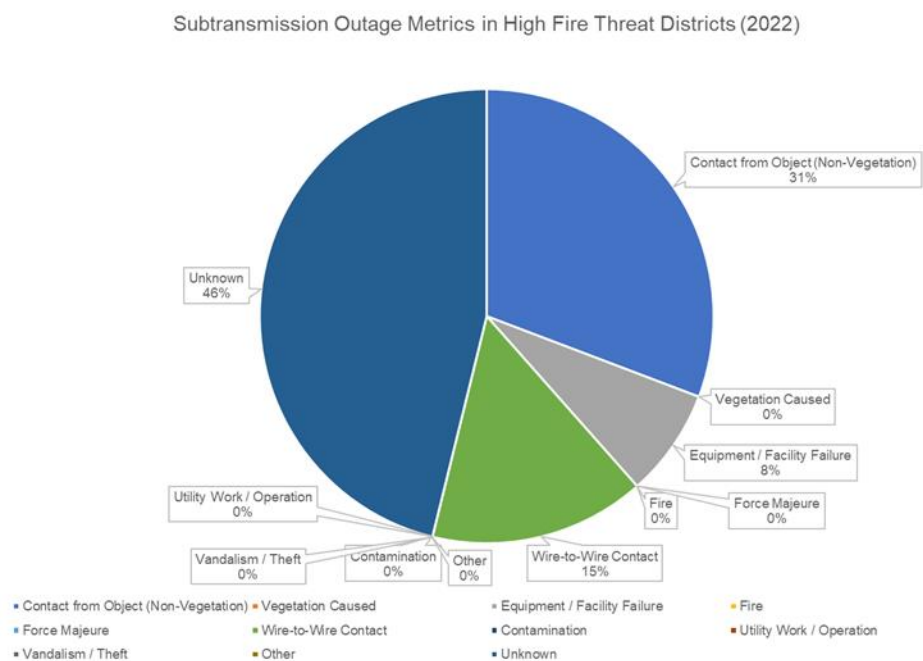


Figure D-2d: Subtransmission Outage Breakdown in HFTDs (2022)



Appendix D – LADWP Metrics (Continued)

Figure D-2e: Subtransmission Outage Breakdown in HFTDs (2023)

Subtransmission Outage Metrics in High Fire Threat Districts (2023)

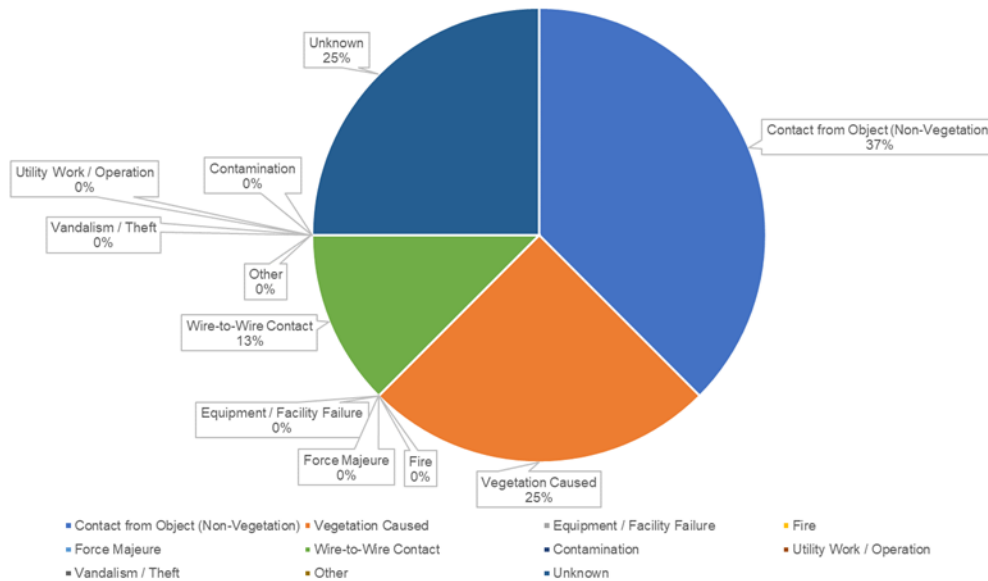
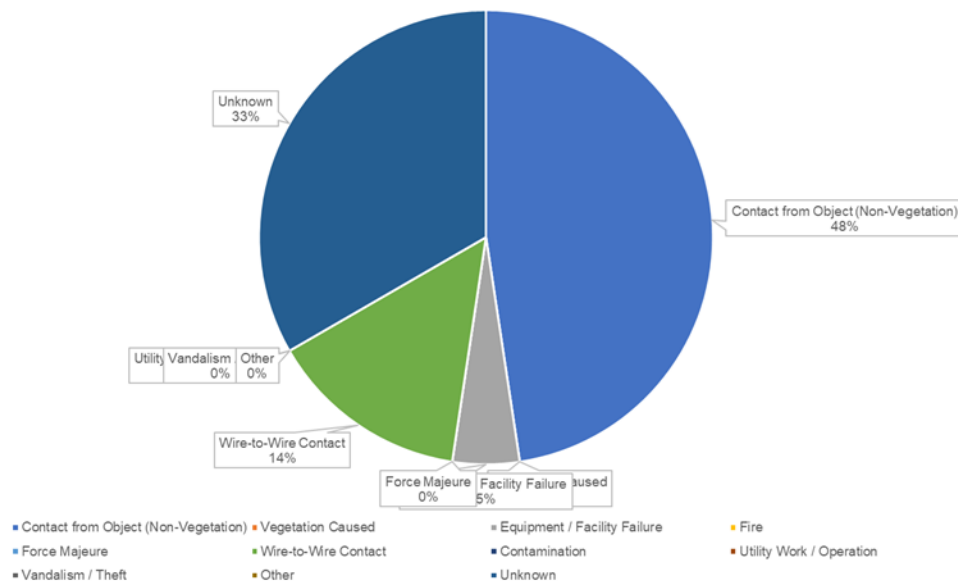


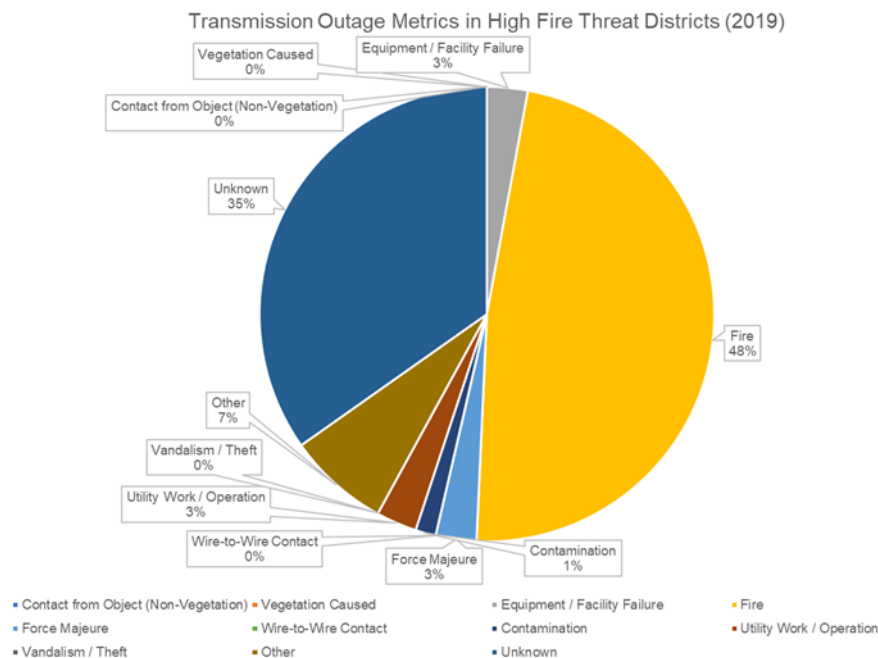
Figure D-2f: Subtransmission Outage Breakdown in HFTDs (2024)

Subtransmission Outage Metrics in High Fire Threat Districts (2024)



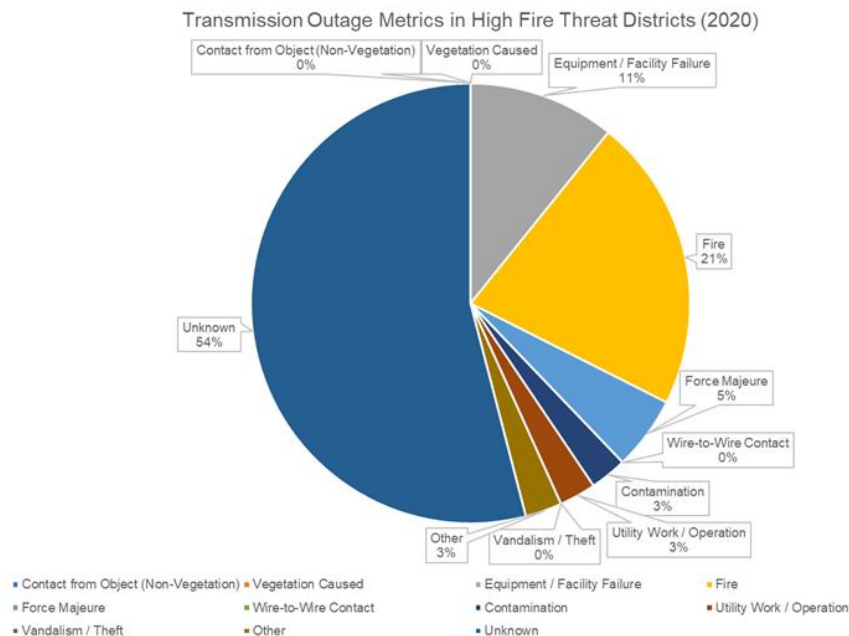
Appendix D – LADWP Metrics (Continued)

Figure D-3a: Transmission Outage Breakdown in HFTDs (2019)*



*Note: Includes additional lines that were de-energized by remedial action during fire incidents.

Figure D-3b: Transmission Outage Breakdown in HFTDs (2020)



Appendix D – LADWP Metrics (Continued)

Figure D-3c: Transmission Outage Breakdown in HFTDs (2021)

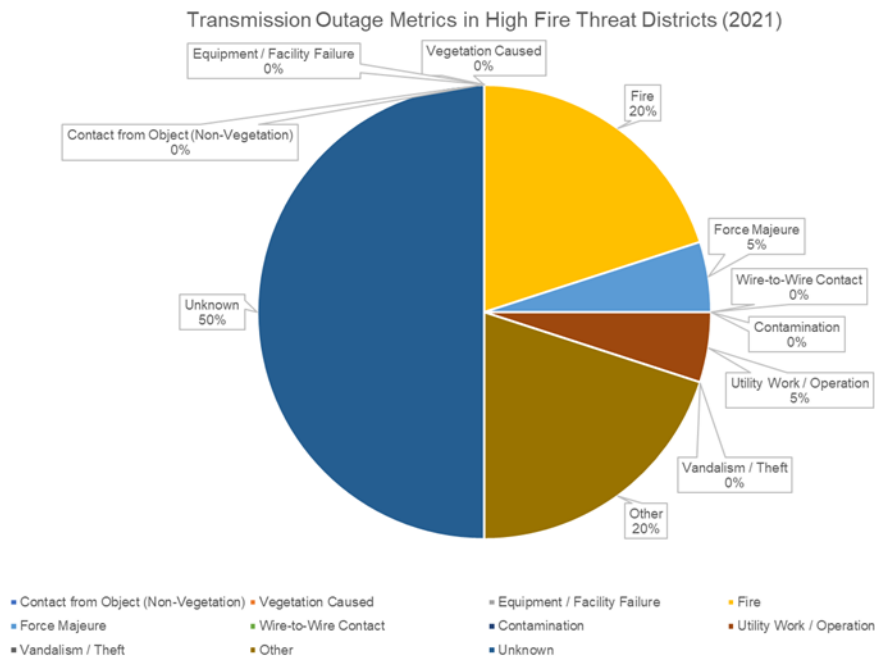
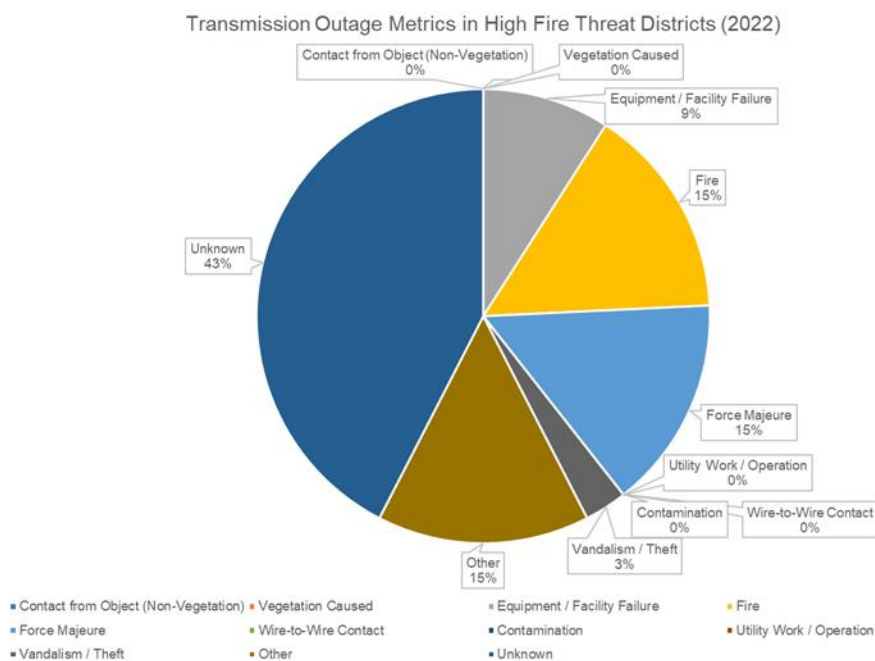


Figure D-3d: Transmission Outage Breakdown in HFTDs (2022)



Appendix D – LADWP Metrics (Continued)

Figure D-3e: Transmission Outage Breakdown in HFTDs (2023)

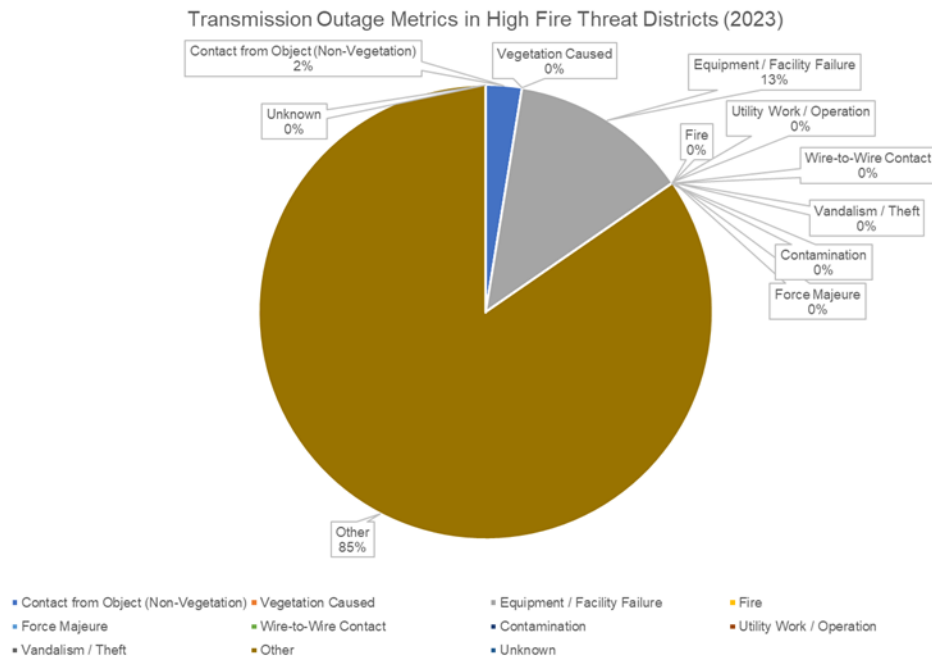
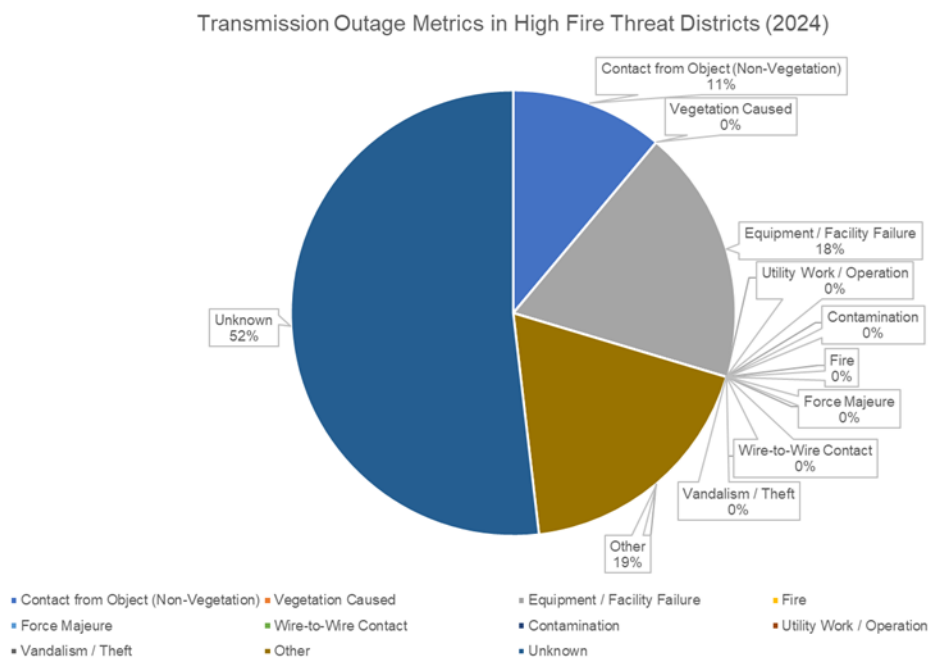


Figure D-3f: Transmission Outage Breakdown in HFTDs (2024)



Appendix D – LADWP Metrics *(Continued)*

Figure D-4a: LADWP's System Average Interruption Duration Index (2018-2023)

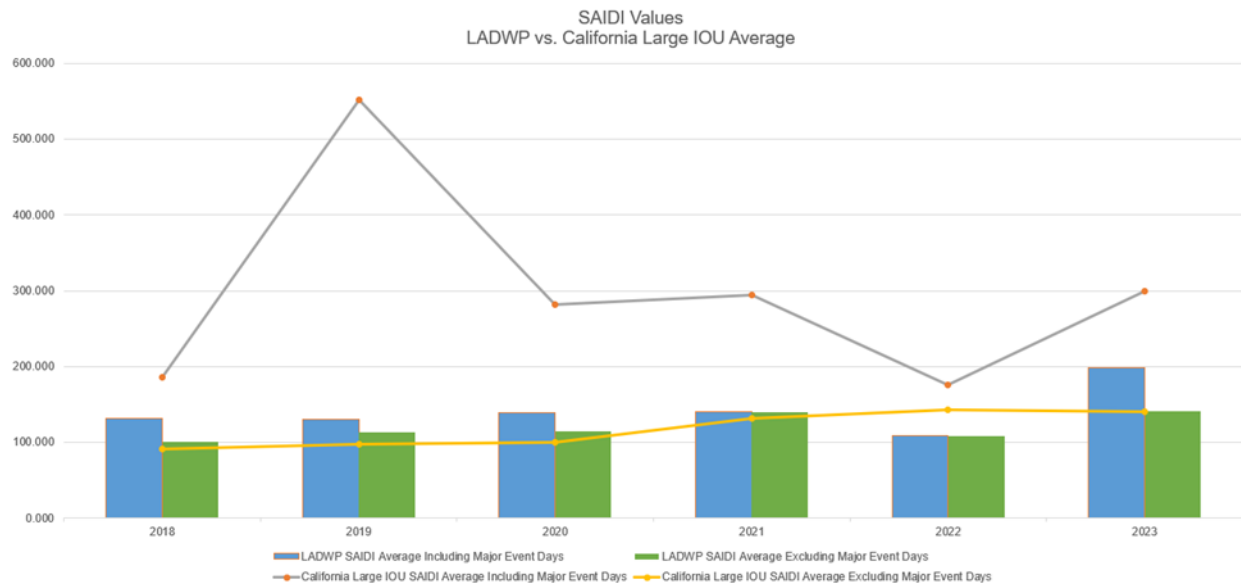
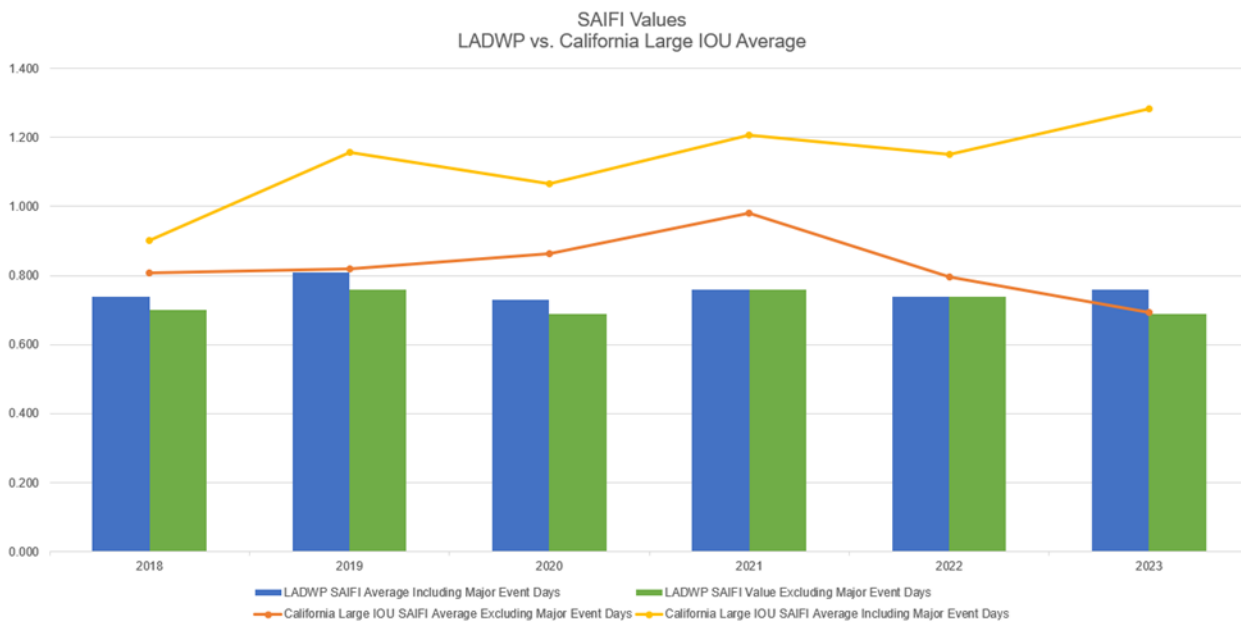
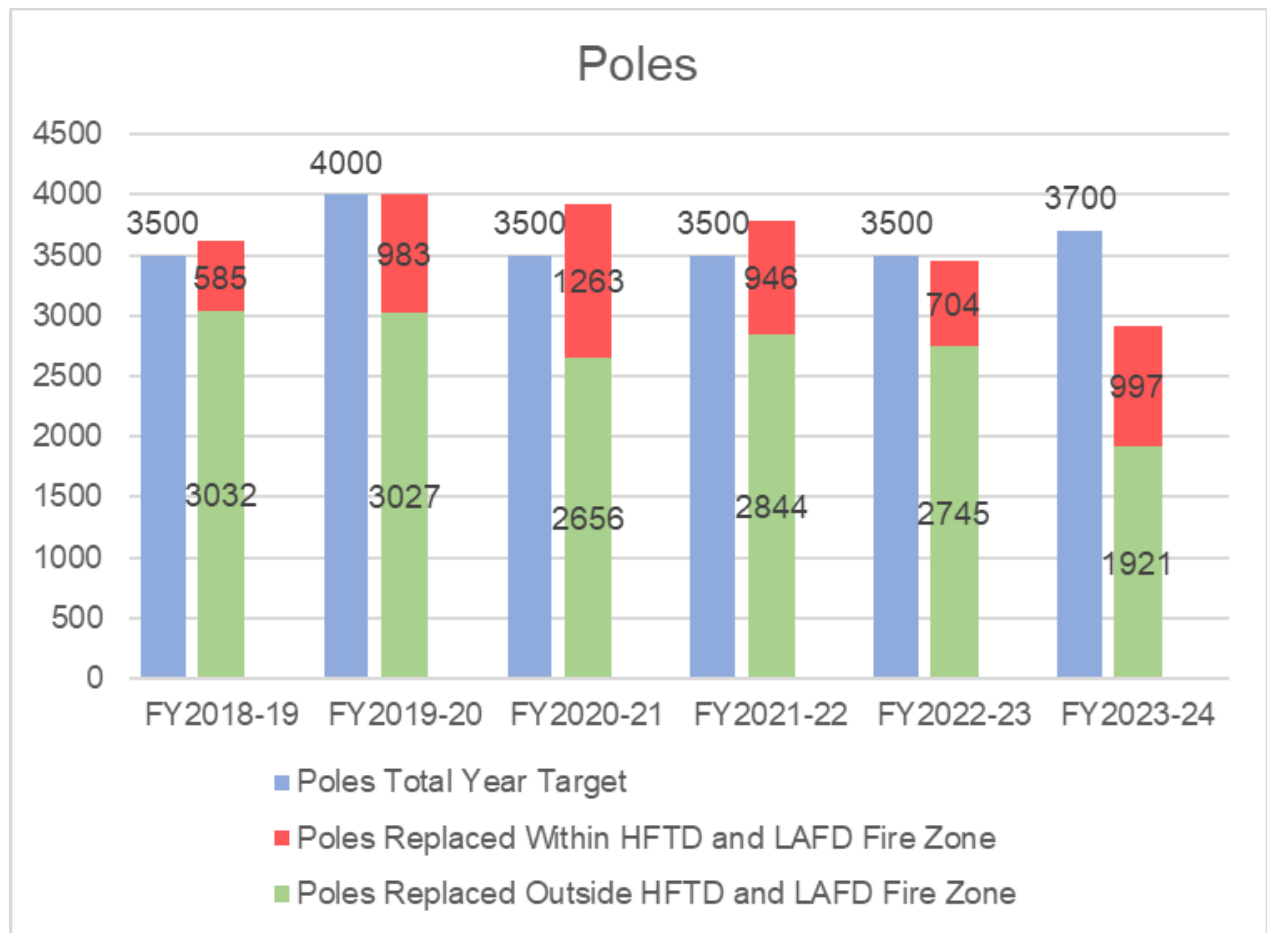


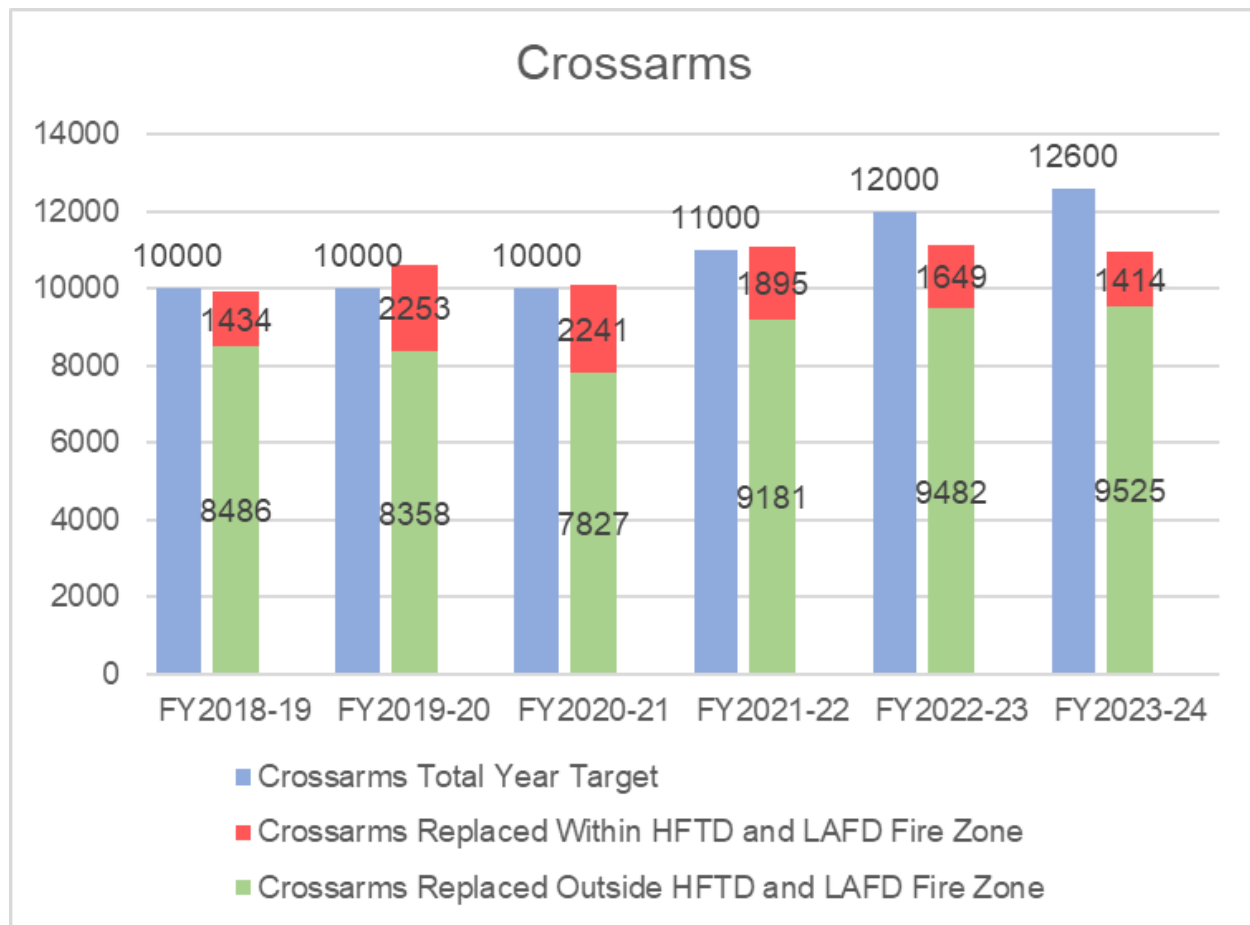
Figure D-4b: LADWP's System Average Interruption Frequency Index (2018-2023)

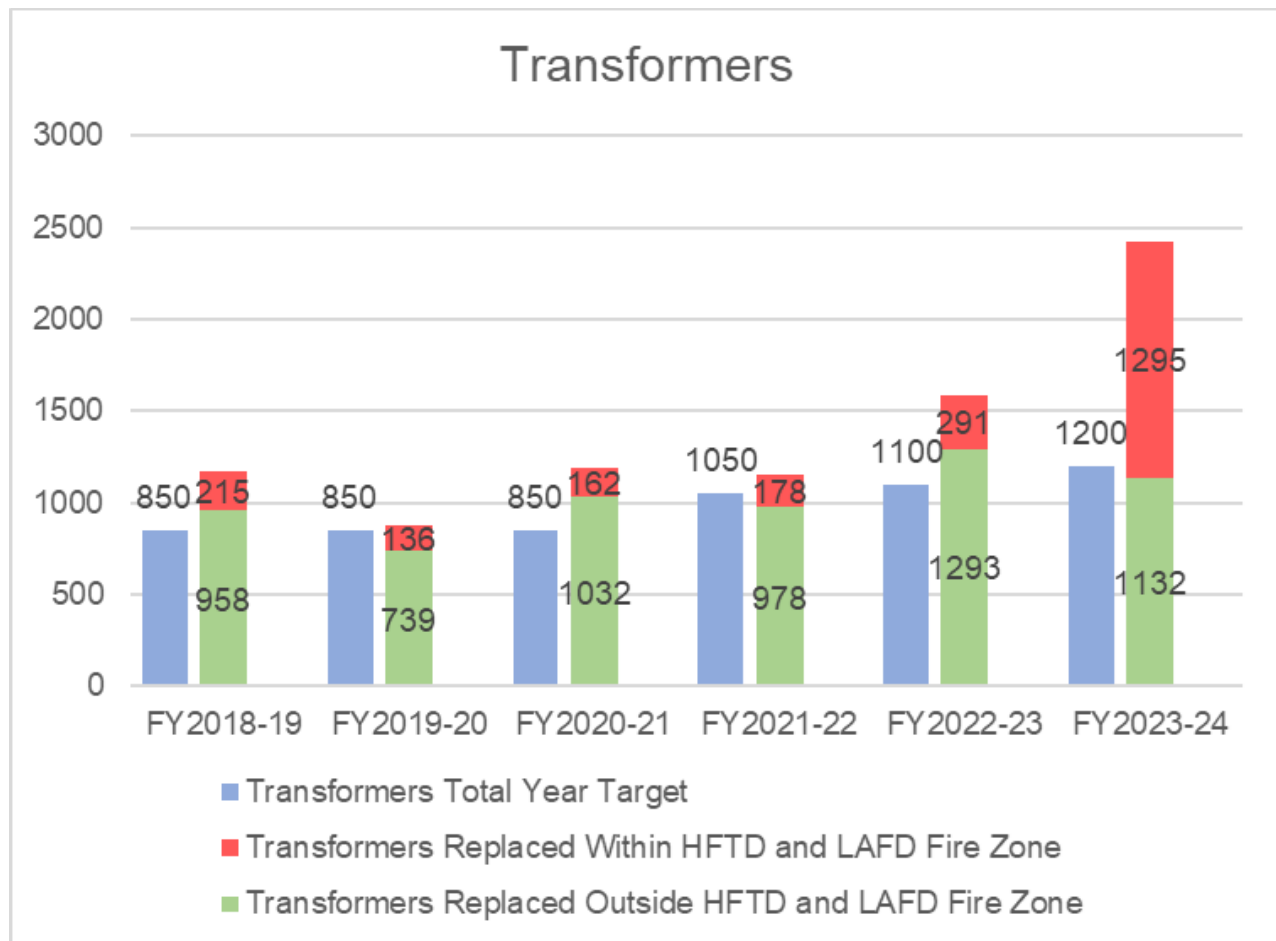


Appendix D – LADWP Metrics *(Continued)*

Figure D-5a: PSRP Pole Replacement

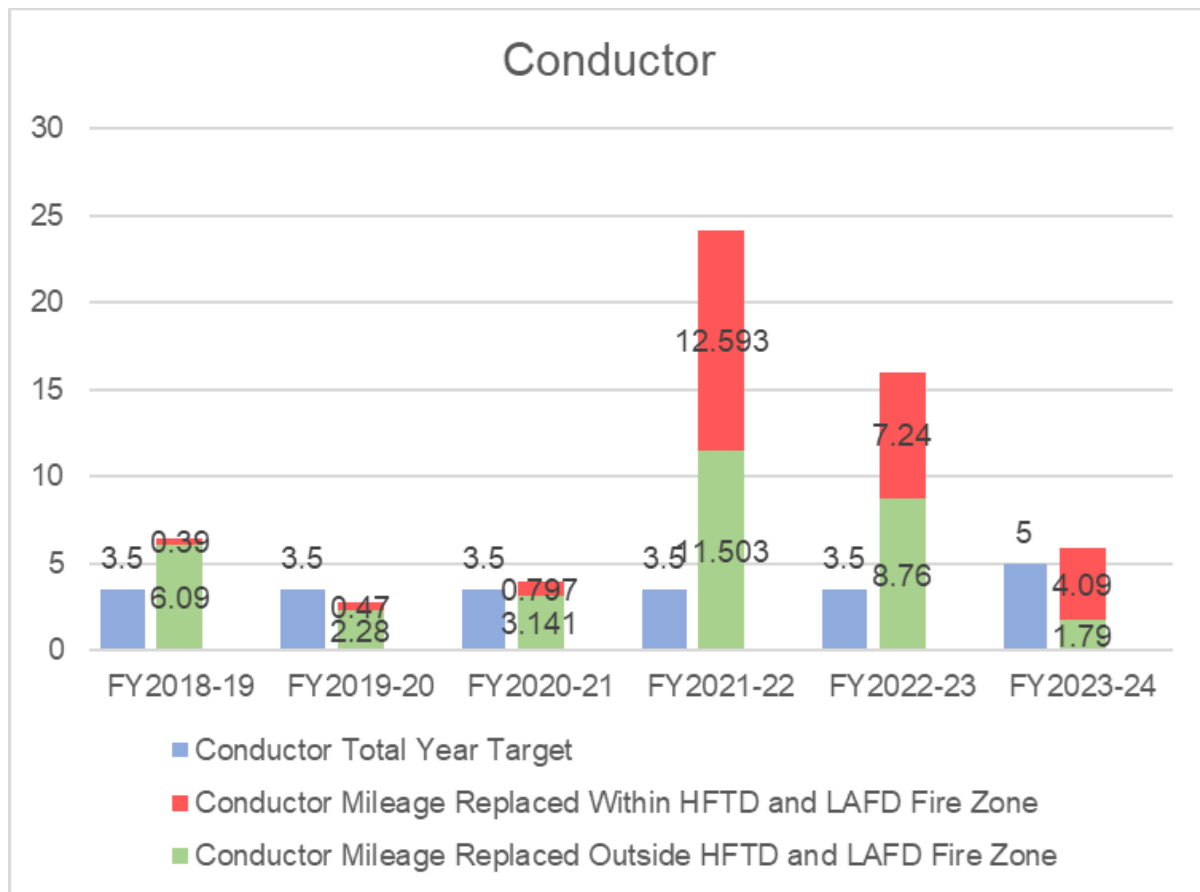


Appendix D – LADWP Metrics *(Continued)***Figure D-5b: PSRP Crossarm Replacement**

Appendix D – LADWP Metrics *(Continued)***Figure D-5c: PSRP Transformer Replacement**

Appendix D – LADWP Metrics *(Continued)*

Figure D-5d: PSRP Conductor Mileage Replacement



Appendix E – Terms and Definitions

Key Term	Definition
ALERTCalifornia	ALERTCalifornia is a public safety program working to understand natural disasters and determine short and long-term impacts on people and the environment to inform management decisions. ALERTCalifornia is available to support situational awareness within LADWP's service territory and provide aid to first responders and firefighters in the event of a wildfire.
American Public Power Association	The American Public Power Association (APPA) is a service organization with approximately 1,400 members from public power utilities among the nation's 2,000 public power utilities that provide electricity to 49 million people. APPA's purpose is to advance the public policy interests of its members and their consumers and provide member services to help ensure adequate, reliable electricity at a reasonable price with the proper protection of the environment.
Assembly Bill 1054	The Assembly Bill 1054 (AB 1054) (2019) was created to encourage utility companies to invest in safety and improve safety culture to limit wildfire risks and reduce costs, created the Wildfire Safety Advisory Board, and required publicly-owned utilities to submit their Wildfire Mitigation Plans to the Wildfire Safety Advisory Board.
Bulk Power System	A large interconnected electrical system made up of generation and transmission facilities and their control systems. Typically considered to be 100kV or above.
CAL FIRE	California Department of Forestry and Fire Protection serves and safeguards the people and protects the property and resources of California from wildfire and other hazards.
California Public Utilities Commission	California Public Utilities Commission (CPUC) is a regulatory agency that regulates privately owned public utilities in the state of California which includes electric power, telecommunications, natural gas, and water companies.
Control	A currently established measure that is modifying risk.
CPUC Tier 2 High Fire Threat District	CPUC Tier 2 High Fire Threat District consists of areas on the CPUC Fire-Threat Map where there is an elevated risk from wildfires associated with overhead utility power lines or overhead utility power-line facilities also supporting communication facilities.
CPUC Tier 3 High Fire Threat District	CPUC Tier 3 High Fire Threat District consists of areas on the CPUC Fire-Threat Map where there is an extreme risk from wildfires associated with overhead utility power lines or overhead utility power-line facilities also supporting communication facilities.
Distribution Circuits	Distribution Circuits are 5-kV circuits primarily operated or dispatched by the Electric Trouble Board (ETB) except that the ECC has jurisdiction from the circuit breaker in the distributing station up to the first isolating device (disconnect or switch) outside of the distribution station. ETB switching on 5kV circuits that requires operation of the distribution station circuit breaker is coordinated through the Energy Control Center.
Enterprise Risk Management Program	The Enterprise Risk Management (ERM) Program is the set of processes, strategies, practices, and activities that collectively provide a structured framework for managing risks across an organization.
Fire Hazard Severity Zone	A Fire Hazard Severity Zone (FHSZ) is an area that has been evaluated for level of hazard based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures. The three levels of hazard are Moderate, High, and Very High.

Key Term	Definition
High Fire Threat Districts	The High Fire Threat District (HFTD) is the composition of the three fire-threat areas, non-HFTD, Tier 2, and Tier 3, on the CPUC High Fire-Threat District Map.
Los Angeles Department of Water and Power	The Los Angeles Department of Water and Power (LADWP) is a vertically integrated public municipal utility that serves more than 4 million residents and local businesses within the City of Los Angeles and Owens Valley.
Los Angeles Fire Department	The Los Angeles Fire Department (LAFD) is a local organization that provides firefighting and emergency services for the City of Los Angeles.
LAFD Fire Zone	The Los Angeles Fire Department (LAFD) Fire Zone are areas designated by the Los Angeles Fire Department's Bureau of Fire Prevention and Public Safety, under criteria established by the State Fire Marshal, with high risk of fast-moving brush fires among habitable communities. Notable features within the Fire Zone include grass/ brush accumulation and cut or piled combustible materials.
Los Angeles Police Department	The Los Angeles Police Department (LAPD) is the municipal law enforcement agency of Los Angeles, California.
Memorandum of Understanding	A Memorandum of Understanding (MOU) is a formal agreement between two or more parties that documents their intentions, roles, and objectives. It is not legally binding but a MOU does document the expectations of each party.
Mitigation	A measure or set of measures designed to reduce the likelihood of a risk event occurring or to reduce the consequences if it does occur.
National Oceanic and Atmospheric Administration	The National Oceanic and Atmospheric Administration (NOAA) is a scientific and regulatory agency within the United States Department of Commerce that forecasts weather, monitors oceanic and atmospheric conditions, charts the seas, conducts deep sea exploration, and manages fishing and protection of marine mammals and endangered species in the U.S. exclusive economic zone.
National Weather Service	The National Weather Service (NWS) is a US government federal agency that provides weather, water and climate data, forecasts, warnings, and impact-based decision support services for the protection of life and property and enhancement of the national economy.
North American Reliability Corporation	The North American Electric Reliability Corporation (NERC) is a not-for-profit international regulatory authority whose mission is to assure the effective and efficient reduction of risks to the reliability and security of the grid. NERC develops and enforces Reliability Standards; annually assesses seasonal and long-term reliability; monitors the bulk power system through system awareness; and educates, trains, and certifies industry personnel.
Owens Valley	Owens Valley is an arid valley east of the Sierra Nevada and North of the Mojave Desert and is home to the towns of Bishop, Lone Pine, Independence, Big Pine, and more.
Public Utilities Code	The California Public Utilities Code (PUC) is one of 29 Codes that contain state statutes. The Public Utilities Code contains 33 Divisions, and the range of topics within this Code includes natural gas restructuring, private energy producers, telecommunication services, and specific municipal utility districts and transit authorities. There are also numerous parts, chapters, and articles containing hundreds of code sections, or individual statutes.

Key Term	Definition
Qualified Electrical Worker	A Qualified Electrical Worker (QEW) is one who has received training in and has demonstrated skills and knowledge in the construction and operation of electric equipment and installations and the hazards involved.
Qualified Person	Per Occupation Safety and Health Administration (OSHA) definition, a Qualified Person is someone who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his ability to solve or resolve problems relating to the subject matter, the work, or the project.
Red Flag Alert	A Red Flag Alert is a notice issued from the LAFD that Red Flag Day conditions exist. Red Flag Alerts from the LAFD are closely associated with parking restrictions.
Red Flag Day	A Red Flag Day is a day within the LAFD Fire Zone (or Very High Fire Hazard Severity Zones) with wind speeds faster than 25 mph and humidity levels being less than 15 percent. The combination of these conditions creates potential hazards associated with a fast-moving brush fire.
Red Flag Warning	A Red Flag Warning means warm temperatures, very low humidity, and stronger winds are expected to combine to produce an increased risk of fire danger. Red Flag Warnings are issued by the National Weather Service (NWS).
Santa Ana Wildfire Threat Index	The Santa Ana Wildfire Threat Index (SAWTI) categorizes Santa Ana winds based on anticipated fire potential. The index uses a comprehensive, state-of-the-art predictive model that includes dead fuel moisture, live fuel moisture, and the greenness of annual grasses to create a detailed daily assessment of the fuel conditions across Southern California.
Senate Bill 901	Senate Bill 901 (SB 901) (2018) Wildfire Protection Package is legislation that aims to address catastrophic wildfires across California.
Southern California Public Power Authority	Southern California Public Power Authority (SCPPA) is a Joint Powers Authority for the purpose of providing joint planning, financing, construction, and operation of transmission and generation projects.
Standardized Emergency Management System	The Standardized Emergency Management System (SEMS) is California's emergency response system and the fundamental structure for the response phase of emergency management.
Subtransmission Circuits	Subtransmission Circuits are the 34.5-kV circuits emanating between Receiving Stations and Distributing Stations or between Distributing Stations. The primary purpose of Subtransmission Circuits is to function as the network to deliver power to the distributing stations, but significant customer load has been installed on the Subtransmission System so that it functionally acts as both a 'subtransmission' system and also as a higher voltage 'distribution system' so is sometimes included in the term 'Distribution System'.
Supervisory Control and Data Acquisition System	The Supervisory Control and Data Acquisition (SCADA) system is used to monitor and/or control the operation of the electrical system during normal and emergency conditions, including the energizing and de-energizing of individual circuits and blocking or enabling of automatic reclosers. The primary users of SCADA are Load Dispatchers at the Energy Control Center.
System Average Interruption Duration Index	The System Average Interruption Duration Index (SAIDI) is a metric used to measure the reliability of U.S. electric utilities, which measures the total time an average customer experiences a non-momentary power interruption in a one-year period.

Key Term	Definition
System Average Interruption Frequency Index	The System Average Interruption Frequency Index (SAIFI) is the average number of times that a system customer experiences an outage during the year (or time period under study).
Transmission Circuit	Transmission circuits are defined as circuits nominally operating at 100-kV or higher. Within LADWP typical Transmission level voltages are 230kV and 500kV although other voltages also exist, including two High Voltage Direct Current (HVDC) circuits. Also referred to as the 'Grid', the Transmission System is the backbone that supports lower voltage level systems. The primary purpose of the Transmission System is to connect generators to Receiving Stations, Receiving Stations to each other, and to connect the LADWP Power System with other utilities and the larger Western Interconnection.
Watch Duty	Watch Duty is both the name of a nonprofit organization that supports agencies across California (including LAFD, LA City and County EOCs) with real-time, operationally relevant wildfire intelligence and the name of the technology that is used to communicate this wildfire intelligence.
Western Region Mutual Assistance Group	The Western Region Mutual Assistance Group (WRMAG) is comprised of voluntary participating utilities, public and private, in an organized effort to communicate and coordinate multiple mutual assistance requests for large scale emergency incidents.
Wildfire Hazard Potential	The Wildfire Hazard Potential (WHP) index or dataset is a long-term planning tool developed by the United States Forest Service (USFS). It incorporates statistical modeling of data on wildfire likelihood and intensity, the location of burnable vegetation, and historical ignition locations to illustrate whether a given location within a utility's service territory is at higher relative risk of a difficult-to-manage wildfire.
Wildfire Mitigation Plan	Wildfire Mitigation Plans (WMPs) are plans enacted by electric utilities within California that aim to reduce the risk of wildfires that originate from electrical equipment or facilities owned by the utility in high fire threat locations.
Wildfire Safety Advisory Board	Assembly Bill 1054, signed into law in July 2019, created the California Wildfire Safety Advisory Board (WSAB). The WSAB advises the Office of Energy Infrastructure Safety on electrical corporations' Wildfire Mitigation Plans (WMP), requirements for these plans, and other wildfire safety matters. Additionally, the Board reviews the WMPs submitted by Publicly-Owned Electric Utilities and Electrical Cooperatives (together, POUs) and provides comments and Advisory Opinions. The Board also serves as an additional forum for the public to provide input on the important topic of wildfire safety.

Appendix F – Acronym Dictionary

The following acronyms are used throughout the WMP:

APPA – American Public Power Association
ANSI – American National Standards Institute
BLM - Bureau of Land Management
CA-DDW – California Division of Drinking Water
CPR – Cardiopulmonary Resuscitation
CEQA – California Environmental Quality Act
CPUC – California Public Utilities Commission
CCA - Communications and Community Affairs Division
CSD – Customer Services Division
CSS – Customer Services Support
DO – Distribution Operations
DPOPS – Dedicated Power Operations Phone System
ECC – Energy Control Center
ECPV – Emergency Command Post Vehicle
EmCC – Emergency Command Center
ERM – Enterprise Risk Management (program)
ETB – Electric Trouble Board
FEMA – Federal Emergency Management Agency
GIS - Geographical Information Systems (group)
HFTD – High Fire Threat District
HVDC – High Voltage Direct Current (circuits)
IIPP – Injury and Illness Prevention Program
IOU – Investor-Owned Utility
ISA – International Society of Arboriculture
ISO – International Organization of Standardization

JLM – Joint Labor Management (committee)
KAS – Key Accounts Section
KPI – Key Performance Indicator
kV – kilovolt (1,000 volts)
LADWP – Los Angeles Department of Water and Power
LAFD – Los Angeles Fire Department
MOU – Memorandum of Understanding
MW – megawatt (1,000,000 watts)
NOAA – National Oceanic and Atmospheric Administration
NWS – National Weather Service
OSHA – Occupational Safety & Health Administration
PCM – Power Construction & Maintenance (Obsolete)
PDC – Power Design and Construction
PDOC – Power Distribution Operations Center
PPE – Personal Protective Equipment
PRC – Public Resources Code
PSO – Power Supply Operations Division
PSRP – Power System Reliability Program
PTD – Power Transmission & Distribution Division (Obsolete)
PUC – Public Utilities Code
QMS – Quality Management System
QWE – Qualified Electric Worker
SAIDI – System Average Interruption Duration Index
SAIFI – System Average Interruption Frequency Index
SAWTI – Santa Ana Wildfire Threat Index
SCADA - Supervisory Control and Data Acquisition (system)
SCPPA – Southern California Public Power Authority
SEMS – Standardized Emergency Management System

SLRCG – State & Local Regulatory Compliance Group
SOM – Substation Operations & Maintenance
TCM – Transmission Construction & Maintenance
TVMP – Transmission Vegetation Management Program
NERC – North American Reliability Corporation
NWS – National Weather Service
USFS - United States Forest Service
UUROC – Unified Utilities Rebuild Operations Center
WECC – Western Electricity Coordinating Council
WHP – Wildfire Hazard Potential (dataset)
WMP – Wildfire Mitigation Plan
WMIS – Work Management Information System (group)
WRMAG – Western Region Mutual Assistance Group
WSAB – Wildfire Safety Advisory Board

Appendix G – References

Laws, Regulations, and Standards

1. 2024 California Code, Public Utilities Code PUC Division 4.1 – Provisions Applicable to Privately Owned and Publicly Owned Public Utilities Chapter 6 – *Wildfire Mitigation*, Section 8387 (PUC § 8387)
2. American National Standards Institute (ANSI) A300 Tree Care Standards - ANSI A300 Part1: *Tree, Scrub, and Other Woody Plant Maintenance – Standard Practices, Pruning*, Issued 2023
3. American National Standards Institute (ANSI) Z133, *Safety Requirements for Arboricultural Operations Manual*, Issued 2017
4. American Society of Quality (ASQ) website, www.asq.org, *Quality Management System – Overview*, accessed June 24, 2025
5. California Assembly Bill 1054 (AB1054), *Public utilities: wildfire and employee protection*, Approved by Governor on July 12, 2019
6. California Code, Public Resources Code (PRC) Section 4292 (PRC § 4292)
7. California Code, Public Resources Code (PRC) Section 4293 (PRC § 4293)
8. California Senate Bill 901 (SB 901), *Wildfires*, Approved by Governor on September 21, 2018
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