SAN FRANCISCO PUBLIC UTILITIES COMMISSION (SFPUC)

2026-2028 WILDFIRE MITIGATION PLAN INDEPENDENT EVALUATOR REPORT

September 1, 2026

DISCLAIMER

California Public Utilities Code (PUC) § 8387 requires local publicly owned electric utilities or electrical cooperatives (herein POU) to prepare a Wildfire Mitigation Plan (WMP or Plan). Additionally, POUs are required to contract with a qualified Independent Evaluator with experience to assess the comprehensiveness of its WMP.

The San Francisco Public Utilities Commission (SFPUC) has requested Grid Subject Matter Experts (GridSME) to conduct a review and provide an Independent Evaluation report of the SFPUC's 2026-2028 WMP to ensure it meets the requirements of PUC § 8387. GridSME's Independent Evaluator (IE) review and assessment is based only on SFPUC's 2026-2028 WMP and evaluates only the comprehensiveness of the Plan as it is written.

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

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1.0 Introduction

The threat of catastrophic wildfires continues to pose a significant risk not only to the State of California, but to the entire western United States and beyond. These fires are fueled in part by changing weather patterns that have resulted in prolonged drought conditions, rising temperatures, and increasingly intense wind events. When an ignition occurs during critical fire weather conditions, it can rapidly escalate into a catastrophic wildfire.

Although wildland fires can originate from many different ignition sources, extreme weather events heighten the risk to utility infrastructure, increasing the likelihood of a fault-related ignition event. While utility-caused wildfires account for fewer than 10 percent of all wildland fire ignitions, some utility-related fires have occurred during extreme fire weather conditions and have resulted in catastrophic outcomes.

California legislation, codified in California Public Utilities Code (PUC) § 8387(a), requires that "each local publicly owned electric utility and electrical cooperative (herein a POU) shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of wildfire posed by those electrical lines and equipment." In compliance with this statute, the San Francisco Public Utilities Commission's (SFPUC) Wildfire Mitigation Plan (WMP or Plan) describes in detail the programs, policies, and initiatives implemented to ensure its electrical infrastructure is constructed, maintained, and operated in a manner that minimizes the risk of causing or contributing to a catastrophic wildfire.

To meet the independent evaluation requirements of PUC § 8387, the SFPUC engaged Grid Subject Matter Experts[1] (GridSME) to conduct an independent review of its 2026–2028 WMP. The scope of this engagement included an assessment of the Plan's comprehensiveness as written,

[1] https://www.gridsme.com/

preparation of a report documenting findings, and presentation of those findings to the SFPUC's governing board at a publicly noticed meeting.

The GridSME team brings more than 100 years of combined experience in electric utility system operations and wildfire mitigation and is well-qualified to assess the comprehensiveness of utility WMPs. GridSME has previously served as the independent evaluator for five California publicly owned utilities. Based on its review of the SFPUC's 2026–2028 Wildfire Mitigation Plan, GridSME concludes that the Plan is comprehensive and satisfies all applicable requirements of PUC § 8387.

2.0 Statutory Requirements for the Wildfire Mitigation Plan

California Senate Bill 254 (09/19/2025) amended PUC § 8387(b)(1) to read as follows: "After January 1, 2026, a local publicly owned electric utility or electrical cooperative shall prepare a wildfire mitigation plan and shall submit the plan to the California Wildfire Safety Advisory Board[2] at least once every four years on a schedule determined by the California Wildfire Safety Advisory Board." The Wildfire Safety Advisory Board (WSAB) consists of an appointed seven-member panel that serves in an advisory role within the California Office of Energy Infrastructure Safety (OEIS).[3] PUC § 326.2(c) requires the WSAB to: "Review and provide comments and advisory opinions to each local publicly owned electric utility and electrical cooperative regarding the content and sufficiency of its wildfire mitigation plan and recommendations on how to mitigate wildfire risk."

[2] https://energysafety.ca.gov/what-we-do/wildfire-safety-advisory-board/
[3] https://energysafety.ca.gov/

3.0 Independent Evaluation Methodology

GridSME conducted a review and evaluation of the SFPUC 2026–2028 WMP, focusing on the Plan as prepared. The review included an assessment of the Plan's structure, content, and supporting documentation, as well as the development of written comments and recommendations for SFPUC's consideration. GridSME's final evaluation examines the Plan's overall comprehensiveness and consistency with statutory requirements, including its compliance with the 17 elements specified in California PUC § 8387 (See Table 1). In addition, the evaluation considers the extent to which the Plan incorporates guidance, recommendations, and prior advisory opinions issued by the WSAB, and guidance by the California Municipal Utilities Association (CMUA).

Table 1 – CPUC § 8387 Statutory Requirements

PUC Code 8387	Compliance Requirements and Corresponding Plan Sections
(a)	Each local publicly owned electric utility and electrical cooperative shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of wildfire posed by those electrical lines and equipment.
(b) (1)	The local publicly owned electric utility or electrical cooperative shall, before January 1, 2020, prepare a wildfire mitigation plan. After January 1, 2026, a local publicly owned electric utility or electrical cooperative shall prepare a wildfire mitigation plan and shall submit the plan to the California Wildfire Safety Advisory Board at least once every four years on a schedule determined by the California Wildfire Safety Advisory Board
(b)(2)	The wildfire mitigation plan shall consider as necessary, at minimum, all of the following:
(b)(2)(A)	An accounting of the responsibilities of persons responsible for executing the plan.
(b)(2)(B)	The objectives of the wildfire mitigation plan.
(b)(2)(C)	A description of the preventative strategies and programs to be adopted by the local publicly owned electric utility or electrical cooperative to minimize

	the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.
(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.
(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.
(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.
(b)(2)(G)	Appropriate and feasible procedures for notifying a customer who may be impacted by the de-energizing 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.
(b)(2)(H)	Plans for vegetation management.
(b)(2)(I)	Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.
(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:
(b) (2)(J)(i)	Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's or electrical cooperative's equipment and facilities.
(b)(2)(J)(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.
(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.

(b)(2)(L)	A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk.
(b)(2)(M)	A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.
(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:
(b)(2)(N)(i)	Monitor and audit the implementation of the wildfire mitigation plan.
(b)(2)(N)(ii)	Identify any deficiencies in the wildfire mitigation plan or its implementation and correct those deficiencies.
(b)(2)(N)(iii)	Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, other applicable statutes, or commission rules.
(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.
(3)(c)	(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.

4.0 Company Overview

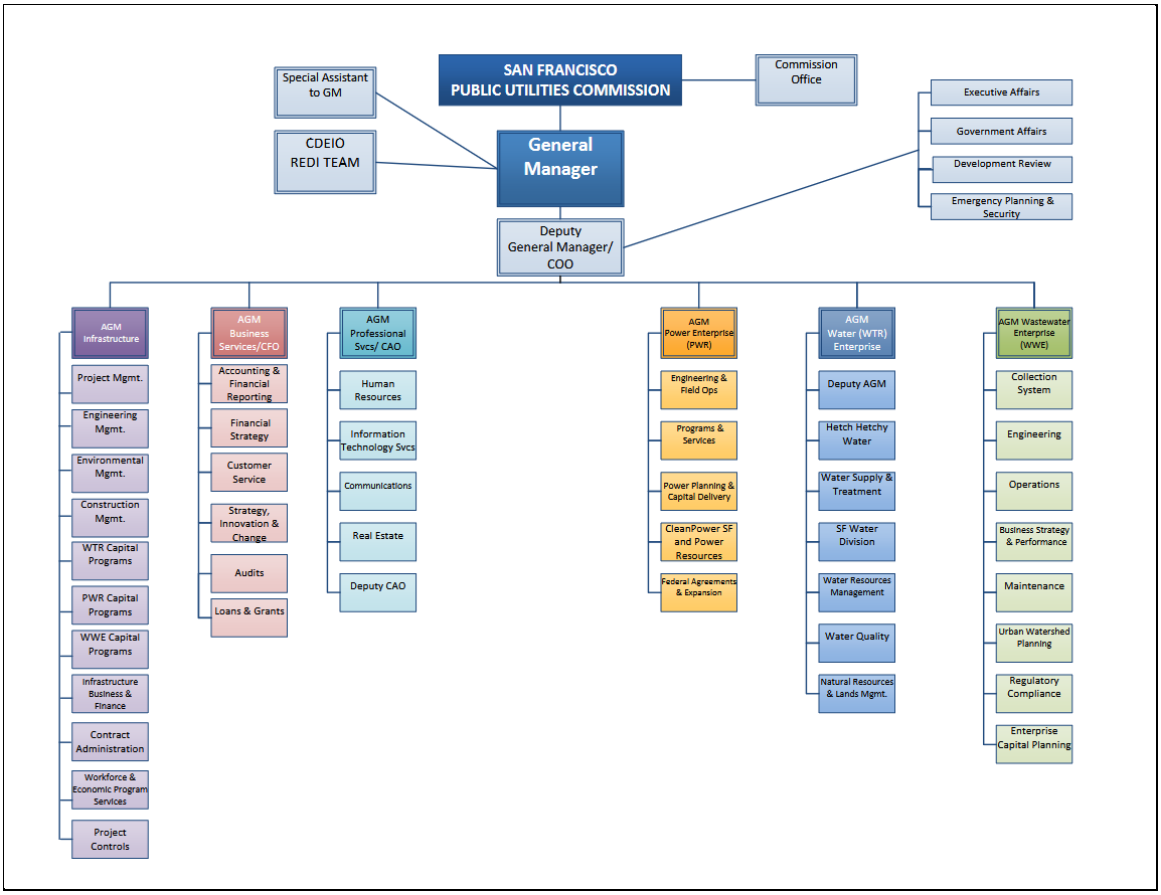
The SFPUC is a department of the City and County of San Francisco (CCSF). The SFPUC provides retail drinking water and wastewater services to the City of San Francisco, wholesale water to three Bay Area counties, green hydroelectric and solar power to Hetch Hetchy electricity customers, and power to some residents and businesses of San Francisco through the CleanPowerSF program. The SPFUC's mission is to provide its customers

with high quality, efficient and reliable water, power, and sewer services in a manner that is inclusive of environmental and community interests, and that sustains the resources entrusted to its care.[4]

The SFPUC is comprised of six business functions, or enterprises, including the Water Enterprise. The Water Enterprise has six divisions, including Hetch Hetchy Water (HHW), Water Supply & Treatment Division (WSTD), and Natural Resources and Lands Management (NRLMD) (Figure 1). HHW, WSTD, and NRLMD have defined responsibilities for managing and maintaining the electrical assets, and land on which they reside, which are described in this Plan. The Water Enterprise is responsible for the development, execution, and oversight of this WMP.

[4] "SFPUC About Us," San Francisco Public Utilities Commission: Our Mission. See https://www.sfwater.org/index.aspx?page=161

Figure 1 – SFPUC Organizational Structure



HHW is responsible for managing, operating, and maintaining the Hetch Hetchy Water and Power (HHWP) Project. The HHWP Project consists of power generation facilities, electric transmission and distribution assets, water storage and conveyance systems, roads, bridges, and ancillary facilities. These assets originate at the Hetch Hetchy Reservoir, located in Yosemite National Park, traverse the counties of Tuolumne, Mariposa, Stanislaus, and San Joaquin, and span to the East Bay communities of Sunol and Newark in Alameda County.

WSTD is responsible for managing, operating, and maintaining the Bay Area portion of the system which includes water storage, treatment, water transmission facilities, a switchyard, and power distribution assets in Alameda and San Mateo counties. The SFPUC owns the watersheds above reservoirs in Alameda and San Mateo counties.

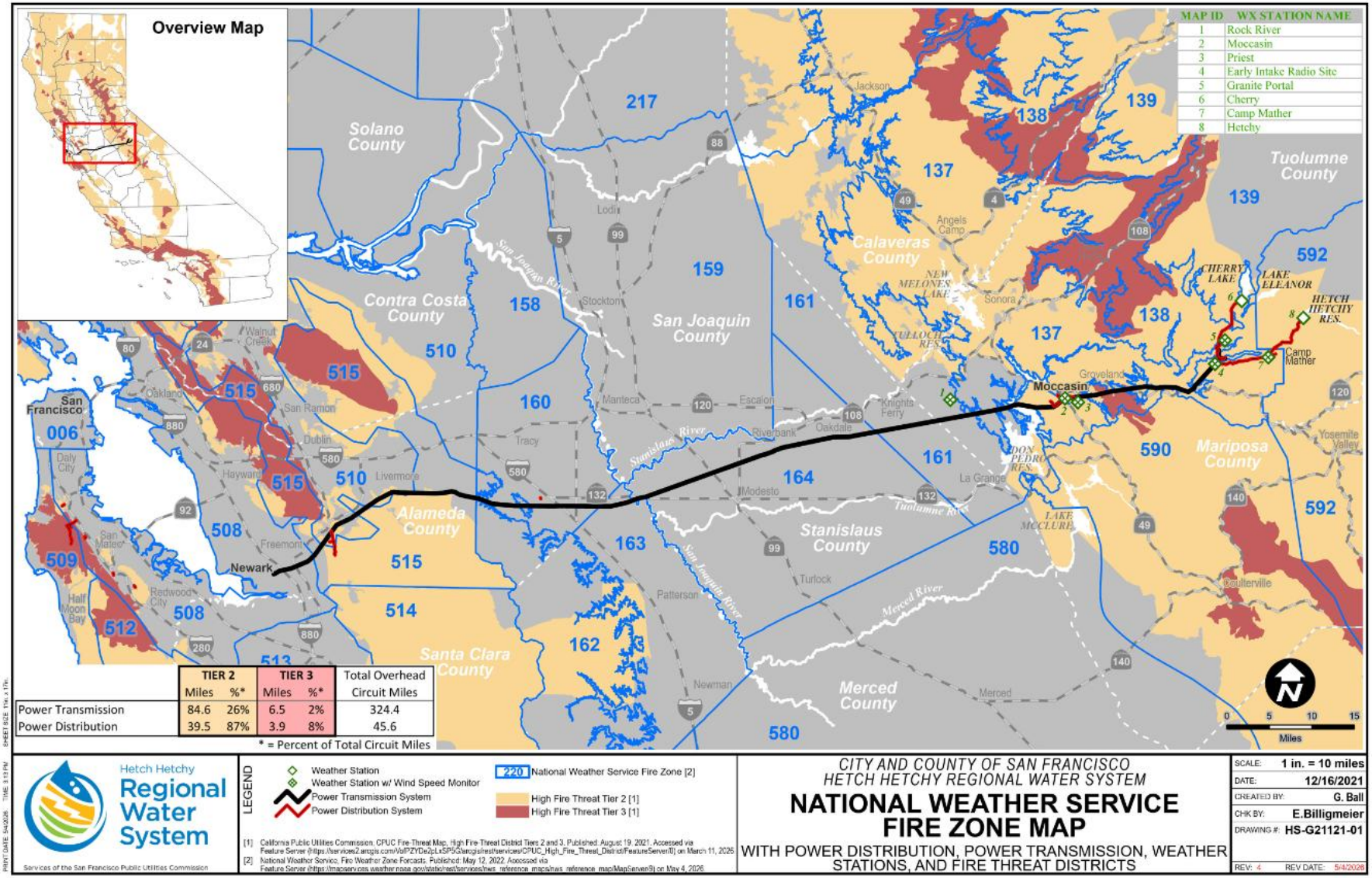
NRLMD is responsible for managing, operating, and maintaining Bay Area lands and watersheds. NRLMD does not operate and maintain electrical assets; however, they do perform vegetation management around the distribution poles and overhead lines in Alameda County and the Peninsula Watershed.

SFPUC owns, maintains, and operates approximately 324 circuit miles of overhead transmission lines, and approximately 49 circuit miles of overhead distribution lines (see Figure 2 below). The power transmission and distribution facilities are within PG&E's service territory, where PG&E is the energy provider. SFPUC transmission facilities are designed to carry energy from SFPUC-owned hydroelectric plants to the grid. SFPUC distribution facilities are designed to take energy from either SFPUC-owned transmission, or from the CA grid, to power SFPUC Water Enterprise operations. Approximately 28% of SFPUC's transmission facilities and 95% of its overhead distribution facilities are located within the CPUC-designated High Fire Threat District (HFTD) Tier 2 or Tier 3. The HFTD is comprised of a High Hazard Zone, and two high fire threat areas where there is an increased risk for utility-associated wildfires.

The three areas are:

1. Tier 1, High Hazard Zone – Zones which are in direct proximity to communities, roads, and utility lines, and are a direct threat to public safety.
2. Tier 2 fire threat area - Depicts areas where there is an elevated risk (including likelihood and potential impacts on people and property) from utility-associated wildfires.
3. Tier 3 fire threat area - Depicts areas where there is an extreme risk (including likelihood and potential impacts on people and property) from utility-associated wildfires.

Figure 1 – SFPUC's Electric Service Areas



5.0 GridSME's Independent Evaluation

The SFPUC's 2026–2028 WMP builds upon the successes and lessons learned from the 2023–2025 WMP's and is designed to maintain compliance with the 17 elements required under California PUC § 8387. In developing the 2026–2028 WMP, the SFPUC also considered recommendations provided through WSAB Advisory Opinions, guidance issued by the CMUA, and recommendations from the IE. Each of the 17 requirements (elements) of PUC § 8387 is presented separately below. For each element, the IE provides a high-level assessment of the Plan, including its comprehensiveness, evaluation of compliance, and, if applicable, recommendations for consideration in future WMP updates.

6.0 PUC § 8387 Requirements

See Table 1.

6.1 PUC § 8387(b)(2)(A)

Requirement: *An accounting of the responsibilities of persons responsible for executing the plan.*

Assessment:

The SFPUC WMP provides a very detailed organizational chart of all divisions of the SFPUC under the leadership of the General Manager (see Figure 1 in WMP). Additionally, a list of personnel positions is provided, listing those who are responsible and/or accountable for development, approval, and implementation of this Plan (see Table 2 below). The SFPUC Commission has responsibility for Plan approval. The SFPUC Assistant General Manager of Water has overall accountability for the development and implementation of the WMP and delegates responsibilities to section

leadership who have specific responsibilities for the various wildfire mitigation programs such as vegetation management, substation inspections, line inspections, line construction, etc.

The SFPUC's Fire Mitigation Specialist oversees the overall development and maintenance of the SFPUC WMP. The Fire Mitigation Specialist is the lead of an internal SFPUC team that has responsibility for reviewing the ongoing status of the SFPUC wildfire mitigation programs and monitoring the effectiveness of the Plan. This team meets monthly, or as required. The Fire Mitigation Specialist is also the primary SFPUC liaison with the CMUA for all wildfire mitigation discussions and monitors all WSAB communications and quarterly meetings.

Comment:

The SFPUC Organizational Chart and Roles and Responsibilities are clearly defined and documented, as shown in Table 2 below. SFPUC personnel have an appropriate understanding of their assigned roles and areas of responsibility. The establishment of a dedicated Fire Mitigation Specialist position provides centralized oversight for the ongoing development, implementation, and maintenance of the WMP.

Table 2 – SFPUC Roles and Responsibilities

Activity	HHW Division: All SFPUC Transmission Facilities; and Distribution Facilities Located within Tuolumne, Stanislaus, Mariposa, and San Joaquin Counties	WSTD and NRLMD Divisions: Distribution Facilities Located in Alameda and San Mateo Counties
Transmission Line Vegetation Clearance Inspections	HHW Right of Way Manager; and Vegetation Manager	N/A
Distribution Line Vegetation Clearance Inspections	HHW Right of Way Manager; and Vegetation Manager	NRLMD and Peninsula Area Manager
Vegetation Management and Removal	HHW Operations and Maintenance Manager	NRLMD Manager
Transmission Asset Inspections Transmission Line Maintenance	HHW Power Generation & Transmission Manager	N/A
Distribution Asset Inspections	HHW Power Generation & Transmission Manager	HHW Power Generation & Transmission Manager

Activity	HHW Division: All SFPUC Transmission Facilities; and Distribution Facilities Located within Tuolumne, Stanislaus, Mariposa, and San Joaquin Counties	WSTD and NRLMD Divisions: Distribution Facilities Located in Alameda and San Mateo Counties
Distribution Line Operations and Maintenance Inspections	HHW Power Generation & Transmission Manager	WSTD Maintenance Section Manager and HHW Power Generation & Transmission Manager
Substation Inspections; Recloser Policy; and De-energization	HHW Operations and Maintenance Manager	HHW Operations and Maintenance Manager
Plan Coordination and Updates	Fire Mitigation Specialist	Fire Mitigation Specialist
Plan Review	HHW Division Manager	NRLMD Manager, WSTD Division Manager,
Plan Review	CCSF City Attorney's Office; and SFPUC Assistant General Manager of Water	CCSF City Attorney's Office; and SFPUC Assistant General Manager of Water
Plan Approval	SFPUC	SFPUC

6.2 PUC § 8387 (b)(2)(B)

Requirement: *The objectives of the wildfire mitigation plan.*

Assessment:

SFPUC WMP Section 2. describes the three primary objectives of the SFPUC WMP that support:

- Minimizing sources of ignition,
- Improving grid reliability and resiliency, and
- Measuring Plan effectiveness.

All wildfire mitigation programs and initiatives described in the SFPUC WMP are designed to construct, maintain, or operate its electrical lines and equipment in a manner that will minimize the risk of SFPUC electrical assets being the origin or contributing source for the ignition of a catastrophic wildfire.

Comment:

The SFPUC continues to develop its wildfire mitigation programs and initiatives to meet and improve on its three primary objectives. The 2026-2028 Plan provides a comprehensive overview of programs that support risk evaluation, operations, vegetation management, asset management, and situational awareness.

Additionally, the 2026-2028 WMP outlines the primary initiatives for this Plan which are to:

- Maintain compliance with Public Utilities Code (PUC) § 8387 and continue to mature our wildfire mitigation initiatives.
- Continue to develop improvements to the Wildfire Operations (Professional)™ risk modeling software.
- Continue to track metrics to inform the SFPUC on how the WMP programs and initiatives are performing.
- Evaluate and assign priorities to system hardening options and create implementation time frames.

6.3 PUC § 8387 (b)(2)(C)

Requirement: *A description of the preventative strategies and programs to be adopted by the local publicly owned electric utility or electrical cooperative to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.*

Assessment:

SFPUC WMP Section 4, Summary of 2025 Wildfire Mitigation Activities, provides a comprehensive overview of major accomplishments achieved during the 2023–2025 WMP cycle across construction, operations, and maintenance programs. These efforts demonstrate the SFPUC's strong and

sustained commitment to employee and public safety, system reliability, and reducing the risk of utility infrastructure being a source of ignition for a wildfire.

Throughout the 2023-2025 WMP cycle, the SFPUC has made significant investments in advanced risk assessment tools, enhanced situational awareness capabilities, continued improvements to its vegetation management programs, and construction, operations, and maintenance programs. Key accomplishments include:

- Installation of Hexion ArmorBuilt™ pole wrap on 190 distribution poles located within the HFTD;
- Continued testing and training of personnel on the full capabilities of Technosylva's Wildfire Analyst Enterprise (WFA-E) application – now rebranded as Wildfire Operations (Professional)™ – with the goal of fully operationalizing the platform and continuing to support daily situational awareness and real-time operational decision-making;
- Engagement of LiveEO, a satellite-based vegetation monitoring service that provides high-resolution data and enhanced visibility into vegetation conditions, including growth patterns and proximity to electrical conductors;
- Ongoing replacement of non-exempt equipment throughout the HFTD; and
- Targeted overhead-to-underground conversions in areas with elevated wildfire risk.

In Section 7, Wildfire Prevention Strategies, the SFPUC 2026–2028 WMP outlines a comprehensive roadmap of planned initiatives, including expanded vegetation management programs, system hardening projects, transmission and distribution inspections and maintenance activities,

substation inspections, and the continued development and integration of situational awareness tools to further reduce wildfire risk.

Comment:

The SFPUC's wildfire mitigation strategies and programs continue to mature and strengthen year over year demonstrating a strong and sustained commitment to employee and public safety, system reliability, and reducing the risk of being the source of ignition for a wildfire.

6.4 PUC § 8387 (b)(2)(D)

Requirement: *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.*

Assessment:

SFPUC WMP Section 9, Evaluating the Performance of the Plan. The SFPUC has adopted the performance and outcome metric tables developed by the CMUA, incorporating input from participating utilities, including the SFPUC, as well as the WSAB (see WMP Appendix 2). Implementation of these standardized metrics will result in the systematic tracking of a significantly expanded set of performance and outcome measures. This enhanced framework will support a more robust and comprehensive evaluation of the SFPUC's wildfire mitigation programs and their effectiveness in reducing wildfire risk.

Comment:

The SFPUC has done an excellent job defining clear, specific metrics, and through the use of Maximo, they are able to effectively document and track those metrics.

6.5 PUC § 8387 (b)(2)(E)

Requirement: *A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.*

Assessment:

Previous WMPs describe specific incidents which resulted in an ignition(s) attributed to SFPUC assets. In each case the SFPUC conducted a root cause analysis and took quick action to reduce the risk of similar occurrences in the future.

Comment:

Although the SFPUC experiences a relatively low frequency of risk events – resulting in limited quantitative historical data – the organization maintains a robust risk management posture. Each identified risk event is systematically investigated, with corrective actions and process enhancements implemented as warranted. This approach reflects SFPUC's continuous improvement framework and its ongoing commitment to mitigating wildfire-related risks and strengthening operational resilience. While data is limited, the SFPUC has not had a reportable ignition incident since 2022.

6.6 PUC § 8387(b)(2)(F)

Requirement: *Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.*

Assessment:

SFPUC WMP Section 7.8, Recloser Policy, describes SFPUC's protocols for disabling line reclosers on transmission and distribution circuits when the Stanislaus National Forest changes the fire danger condition from Low to Moderate. This section also describes the line restoration procedures following an unplanned interruption while the reclosing function is disabled.

In addition to fire weather condition declarations issued by the U.S. Forest Service (USFS), the SFPUC also relies on the Wildfire Operations (Professional) platform to support operational decision-making through four-day weather and wildfire risk forecasts. These forecasts provide advanced visibility into evolving fire-weather conditions, enabling proactive planning, coordination, and operational readiness.

The platform also includes circuit-level forecasting and automated alerting capabilities that allow personnel to establish operational thresholds based on key meteorological parameters, including sustained wind speed, wind gusts, and relative humidity. When predefined thresholds are met or exceeded, the system generates automated alerts for affected circuits. This functionality enables early identification of elevated fire-weather risk impacting specific infrastructure, supporting timely mitigation actions and improved situational awareness.

Section 7.11, De-energization for Public Safety, describes the SFPUC protocols for de-energizing transmission or distribution lines for public safety during critical fire weather conditions. The SFPUC has only six retail customers connected directly to their facilities. Five customers are located within a Tier 2 HFTD, and one is outside the HFTD. Those customers have a generator and experience no adverse impacts due to a utility power interruption. All other load is internal SFPUC owned and operated facilities that have backup generation and do not experience any operational impacts.

Section 8.1, Coordination with Critical Infrastructure Sectors. The SFPUC has identified only two privately owned and operated cellular antennas that could be impacted by a SFPUC De-Energization for Public Safety event. During planned or unplanned interruptions of the SFPUC lines that could impact these cellular sites, the SFPUC will communicate with the wireless provider on the expected timing and duration of the outage. Both sites have backup generators to avoid disruption to services during planned and unplanned outages.

6.7 PUC § 8387(b)(2)(G)

Requirement: *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.*

Assessment:

Section 8, Stakeholder Outreach and Engagement, describes the SFPUC procedures for communicating with stakeholders regarding potential service interruptions. The SFPUC provides retail electric service to a lodging facility located in the Stanislaus National Forest, and two communication antennas. These customers maintain a backup generator at their facilities and experience no operational impacts when there is an interruption in service. The SFPUC meets with these customers to provide them with an overview of the SFPUC operational protocols, potential impacts to them, and will communicate with them if an interruption in service is imminent.

Additionally, the SFPUC has protocols in place for collaboration and communication with neighboring utilities, fire agencies, CMUA, and the WSAB.

Comment:

SFPUC must be commended on their communication and collaboration with external partners and neighboring utilities. These partners include CAL FIRE, USFS, Bureau of Land Management, Pacific Gas & Electric, and other local, regional, state, and federal agencies.

6.8 PUC § 8387(b)(2)(H)

Requirement: *Plans for vegetation management.*

Assessment:

The SFPUC implements a comprehensive, risk-based Vegetation Management (VM) program for its electric transmission, distribution, and substation facilities that meet or exceed applicable minimum industry standards and statutory requirements. SFPUC's VM program, as described in Section 7.4 of the WMP, is designed to ensure public and worker safety, electric system reliability, and wildfire risk reduction while maintaining environmental stewardship and regulatory compliance.

SFPUC's VM inspection and maintenance programs are consistent with the requirements of CPUC General Order (GO) 95, NERC Reliability Standard FAC-003, California Public Resources Code (PRC) §§§ 4291, 4292 and 4293, and CAL FIRE's California Power Line Fire Prevention Field Guide. Program implementation is overseen by the Right of Way (ROW) Manager and governed by SFPUC internal procedures and plans, including:

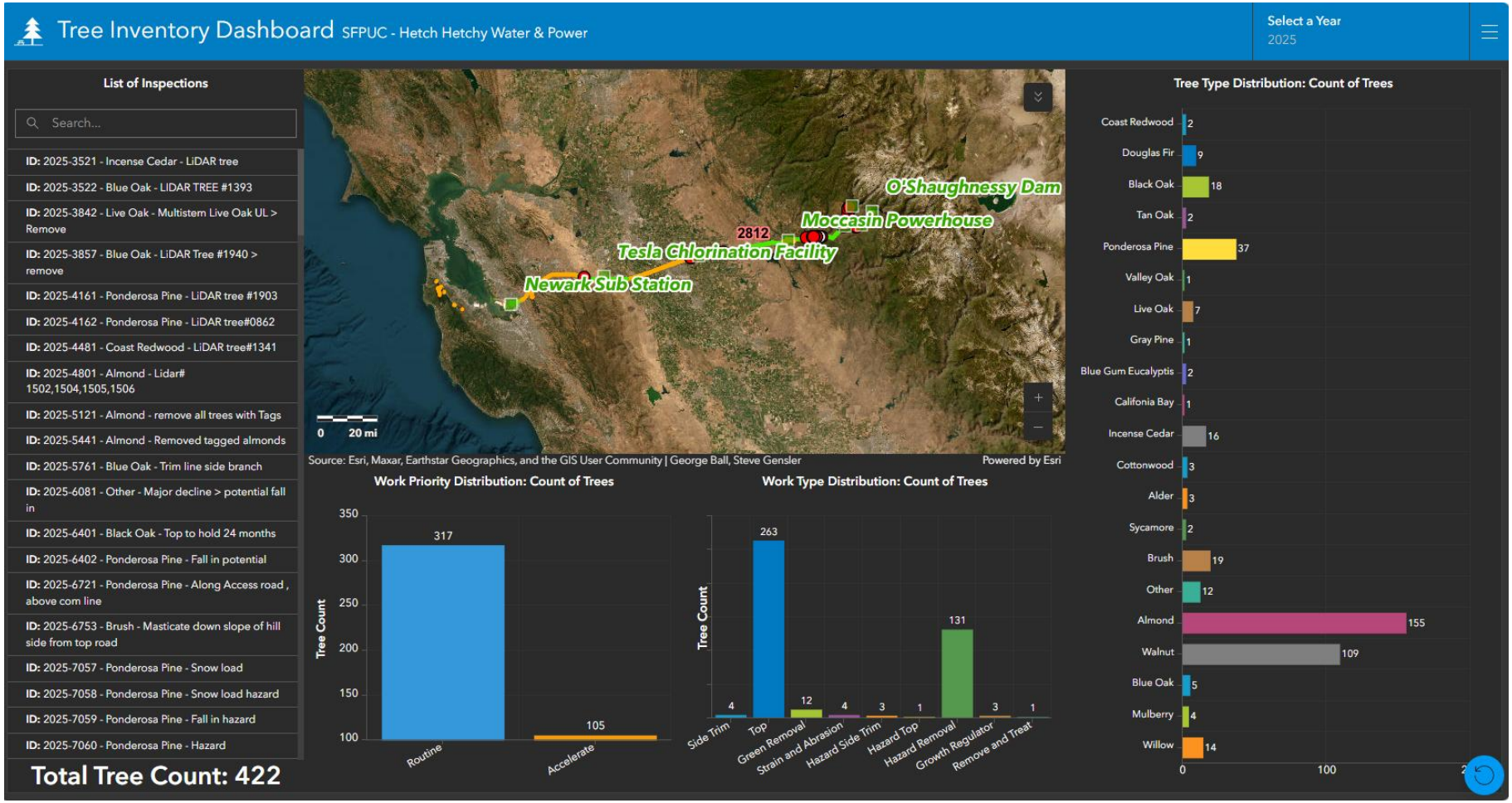
- Hetch Hetchy Water and Power (HHW) Transmission Vegetation Management Program

- HHW 115 & 230 kV Transmission Vegetation Management Plan
- Right of Way (ROW) Integrated Vegetation Management (IVM) Policy
- HHW Power Distribution Vegetation Management Plan

VM crews perform work with registered professional foresters, and with arborists with the following certifications: International Society of Arboriculture (ISA) Certified Arborist, ISA Certified Utility Arborist, and ISA Tree Risk Assessment Qualified (TRAQ).

The SFPUC continues to leverage the internally developed "Vegetation Management Dashboard" to track VM work. (see Figure 3 below).

Figure 2 – Vegetation Management Dashboard



HHW continues to receive data from LiveEO, a software company that provides artificial intelligence (AI)–driven satellite observation data focused on electric infrastructure assets. SFPUC currently leverages LiveEO's vegetation management capabilities. LiveEO applies its AI models to satellite imagery to identify and locate hazard trees within SFPUC's overhead electrical line footprint. HHW will use this data to track vegetation growth trends and to help inform future vegetation management work needs.

Comment:

The IE commends the SFPUC for its level of detail in describing the VM programs.

The IE recommends that SFPUC expand the documented VM procedures to encompass the Water Supply and Treatment and the Natural Resources and Land Management divisions, in addition to the Hetch Hetchy Water division. Expanding the procedures will help ensure consistency, clarity, and uniform implementation of VM practices across all applicable Water Enterprise divisions.

6.9 PUC § 8387 (b)(2)(I)

Requirement: *Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.*

Assessment:

SFPUC WMP Section 7.5, Overhead Asset Inspections, provides an overview of the SFPUC's transmission and distribution line inspection requirements for facilities within the SFPUC HFTD, including substations, switchyards, and powerhouses. The SFPUC owns, operates, and maintains transmission and distribution lines, and substations, from the Sierra Nevada Mountains across the San Joaquin Valley to the South Coast Range

Mountains. The SFPUC asset inspection programs are consistent with the requirements of CPUC GO's 95 and 165 for electric distribution and transmission facilities, and GO 174 for substations.

Comment:

The IE commends the SFPUC for the level of detail provided in describing the asset inspection programs.

The IE recommends that SFPUC expand the documented line inspection procedures to encompass the Water Supply and Treatment and the Natural Resources and Land Management divisions, in addition to the Hetch Hetchy Water division. Expanding the procedures will help ensure consistency, clarity, and uniform implementation of inspection practices across all applicable Water Enterprise divisions.

6.10 PUC § 8387 (b)(2)(J)(i) and (ii)

Requirement: (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:*

> **(b)(2)(J)(i)** *Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's or electrical cooperative's equipment and facilities.*
>
> **(b)(2)(J)(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.*

Assessment:

SFPUC WMP Section 6, Wildfire Risks and Risk Drivers, describes the risks and risk drivers associated with design, construction, operation and maintenance; and topographic and climatological risk factors associated with SFPUC electrical assets within the HFTD.

The SFPUC does not have a high number of risk events, which is the primary factor for the limited data available to draw meaningful conclusions and identify asset risk factors. However, vegetation contact has been identified as their primary risk driver for a wildfire ignition from electrical facilities. SFPUC has identified a number of potential risks based on experience of long-term employees and has instituted various risk reduction programs as described in Section 6.3 of the WMP.

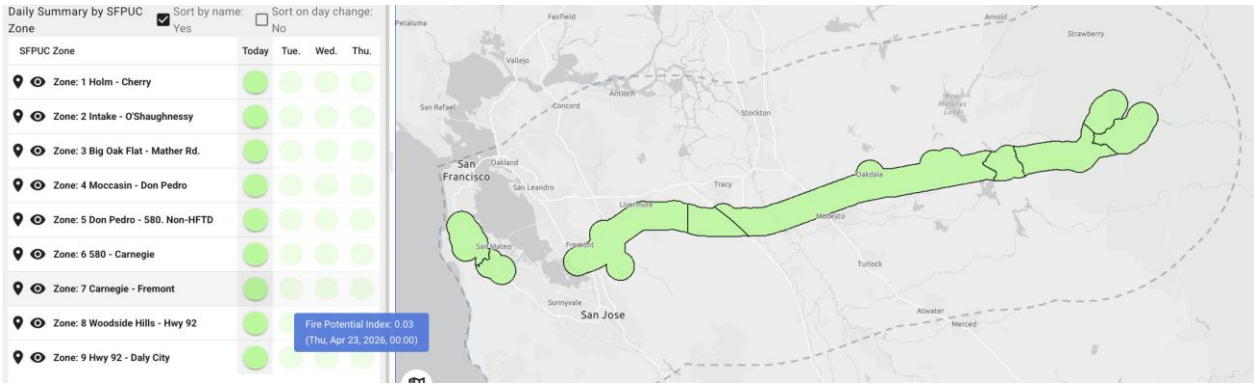
Approximately 35% of the SFPUC service territory is within the HFTD but poses minimal risk for a catastrophic wildfire. SFPUC topographic risks are located on the west side of the Sierra Nevada Mountain range and the South Coast Mountain range. Some of these mountain areas have dense vegetation, however, a large portion of their service territory is in the San Joaquin Valley consisting of flat terrain covered with frequently irrigated crops that pose no risk for a catastrophic wildfire. The climatological risk factors experienced within the SFPUC service territory are consistent with what is experienced throughout California. Those risks are associated with (1) extended drought conditions, (2) lack of early fall rains, (3) hot temperatures, (4) high winds, (5) steep terrain, and (6) vegetation type and density.

Comment:

In 2023 the IE recommended that the SFPUC leverage Technosylva's Wildfire Operations (Professional) application, to inform the prioritization of risk reduction programs to those areas of highest risk first. In 2025, the

SFPUC further refined this risk-based framework by delineating nine discrete operating zones (see Figure 4 below), facilitating a more granular, daily zone-specific wildfire risk assessment and enabling targeted application of mitigation strategies.

Figure 3 – SFPUC Operating Zones



6.11 PUC § 8387 (b)(2)(K)

Requirement: *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.*

Assessment:

SFPUC WMP Section 6.5, Changes to the CPUC Fire Threat Map, states the SFPUC agrees with the existing CPUC HFTD boundaries and makes no recommendation for expanding or minimizing the current HFTD.

The Wildfire Operations (Professional) application provides SFPUC with visibility into CPUC HFTD boundaries and neighboring investor-owned utility wildfire risk area boundaries. This visibility supports validation that SFPUC-designated high fire risk areas are accurately and appropriately defined.

Additionally, the SFPUC reviewed CAL FIRE's Fire Hazard Severity Zone (FHSZ) map and concluded there is no additional wildfire threat than what is identified within the HFTD.

6.12 PUC § 8387 (2)(L)

Requirement: *A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk.*

Assessment:

SFPUC WMP Section 6.1, Enterprise-Wide Safety Risks, describes the SFPUC's enterprise wildfire risk reduction methodology. The SFPUC continues to rely primarily on the institutional knowledge of its employees with extensive maintenance and operations experience to inform the company of potential safety and reliability risks. The SFPUC closely monitors wildfire incidents impacting other utilities to gain knowledge of trends throughout the industry and how grid improvements/upgrades can be applied at the SFPUC to avoid similar risks.

Comment:

The adoption of the CMUA- and WSAB-recommended metrics will enhance SFPUC's ability to consistently track risk events and systematically prioritize risk mitigation actions based on data-driven insights.

6.13 PUC § 8387 (2)(M)

Requirement: *A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.*

Assessment:

SFPUC WMP Section 7.11.3, Restoration of Service, describes SFPUC's procedures for restoring electrical service following a wildfire, a de-energization for public safety event, or if a line experiences an unplanned (forced) interruption for any reason.

For restoration of service after a wildfire the SFPUC states, "Following a wildfire, the SFPUC will restore service when it is safe for staff to access the damaged area(s). The SFPUC will not access burn areas until the authority having jurisdiction (i.e., CAL FIRE, USFS, local fire agency) grants permission to enter the burn area to conduct a damage assessment. Following a full damage assessment, if required, the SFPUC will perform repairs, and restoration will proceed following established priority and restoration procedures."

The SFPUC has well-defined standard operating procedures for safely restoring service following an interruption, a de-energization for public safety, or other events that might cause significant infrastructure impacts.

6.14 PUC § 8387 (2)(N)(i), (ii) and (iii)

Requirement: *A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following*:

(2)(N)(i) *Monitor and audit the implementation of the wildfire mitigation plan.*

(2)(N)(ii) *Identify any deficiencies in the wildfire mitigation plan or its implementation and correct those deficiencies.*

2(N)(iii) *Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that*

are carried out under the plan, other applicable statutes, or commission rules.

Assessment:

SFPUC WMP Section 9, Evaluating the Performance of the Plan, describes the SFPUC methodology for monitoring, auditing, and evaluating the implementation and effectiveness of its WMP programs. The SFPUC leadership are responsible for ensuring compliance with SFPUC's wildfire mitigation programs, and the Assistant General Manager of Water has overall accountability for the development and implementation of the Plan. All specific program responsibilities are delegated to leadership overseeing their respective departments. Additionally, the Fire Mitigation Specialist oversees the overall development and maintenance of the WMP and continuously monitors the ongoing status of the wildfire mitigation programs.

As previously mentioned, the SFPUC continues to have limited data (metrics) to help determine plan effectiveness or identifying plan deficiencies. This is due to the high reliability of its electrical grid.

For the 2026-2028 Plan cycle the SFPUC has adopted the metrics tracking template recommended by both the CMUA and WSAB. This will provide more detailed metrics and support more informed decisions on prioritizing wildfire mitigation programs.

6.15 PUC § 8387 (b)(3)

Requirement: *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.

Comment:

The SFPUC has consistently maintained full compliance with this requirement. Annually, prior to the WMP filing deadline, the SFPUC made the WMP available for public review and comment both through its website and during a duly noticed public meeting of the SFPUC Commission.

6.16 PUC § 8387 (c)

Requirement: *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.*

Comment:

The SFPUC has consistently maintained full compliance with this requirement. In all prior filing years in which an IE report was required, the SFPUC has contracted with GridSME to provide an independent evaluation of their Plan. As previously mentioned, GridSME brings years of experience in the development of Wildfire Mitigation Plans.

The IE is scheduled to present the SFPUC 2026-2028 WMP at a publicly noticed meeting of the Commission on September 8, 2026.

7.0 Summary

The SFPUC seeks to comply with California Senate Bill 901 and 254, codified in PUC § 8387, by ensuring that its electrical lines and equipment are constructed, maintained, and operated in a manner that minimizes wildfire risk. Since its initial WMP filing in 2019, SFPUC has demonstrated ongoing and measurable improvements to its Wildfire Mitigation Program. Based on an Independent Evaluation of SFPUC's 2026–2028 WMP, GridSME finds that the Plan is comprehensive and satisfies the requirements of Public Utilities Code § 8387.