

Energy Safety - IOU WMP Guidelines-Water Resources (DRAFT)

Chapter 12 currently emphasizes emergency preparedness, wildfire/PSPS response and recovery, coordination with public-safety partners, and collaboration in local and regional wildfire mitigation planning. The following supplemental language would fit that framework while expanding it to recognize **wildfire water availability as an IOU/ITO risk-reduction and mitigation tool**.

12.3 Wildfire Water Availability and Response Infrastructure as a Risk-Reduction Measure

The ITO must evaluate the availability, accessibility, reliability, and resiliency of water resources that may support wildfire suppression within or adjacent to its service territory and areas of elevated wildfire risk. For purposes of wildfire mitigation and emergency preparedness, the availability of strategically located wildfire water resources should be recognized as a risk-reduction measure that can improve the effectiveness and efficiency of initial attack, sustained suppression, structure protection, and protection of critical electric infrastructure.

Wildfire water availability may include existing hydrants, reservoirs, tanks, ponds, and other suitable water sources, as well as **pre-positioned manufactured helicopter dip tanks and mobile or portable wildfire water storage tanks** capable of supporting firefighting helicopters, engines, and water tenders. Such resources may provide particular mitigation value in wildland-urban interface, rural, remote, mountainous, high-fire-threat, and water-constrained areas where conventional municipal water infrastructure is unavailable, vulnerable, insufficient, or may be impaired during a wildfire or Public Safety Power Shutoff event.

12.3.1 Risk-Reduction Evaluation

As part of its wildfire mitigation and emergency preparedness planning, the ITO should evaluate whether limitations in wildfire suppression water availability could materially increase the potential consequences of a utility-associated wildfire or reduce the ability of public safety agencies to contain a wildfire threatening utility infrastructure, communities, evacuation routes, critical facilities, watersheds, or other assets.

The evaluation should consider, as applicable:

- Geographic proximity of reliable wildfire water sources to High Fire-Threat Districts and other areas of elevated wildfire risk;
- Accessibility of water sources to firefighting helicopters, engines, and water tenders during emergency conditions;
- Reliability and redundancy of water supplies during wildfire, electrical outage, PSPS, drought, smoke, road closure, or other emergency conditions;
- Opportunities to strategically pre-position **manufactured helicopter dip tanks and mobile water storage tanks** in coordination with fire agencies, water agencies, local

governments, Tribal governments, emergency management agencies, and other public safety partners;

- The potential for reduced helicopter turnaround and refill time, increased suppression tempo, improved utilization of aviation and ground resources, and faster delivery of water to the fire environment;
- Protection of electric transmission and distribution infrastructure, substations, communications facilities, communities, evacuation routes, and other critical assets;
- Use of water-resource improvements to provide redundancy where existing hydrants, reservoirs, pipelines, pumps, or municipal water systems may be unavailable or compromised; and
- Opportunities to integrate wildfire water resources with community wildfire protection plans, local hazard mitigation plans, utility wildfire mitigation strategies, emergency response plans, and regional wildfire resilience programs.

12.3.2 IOU/ITO Wildfire Mitigation and Risk Reduction

Where supported by risk analysis, an ITO should identify wildfire water-resource projects or partnerships that can reasonably reduce wildfire consequences and improve emergency response capability. Such measures may include funding, cost sharing, siting, easements, access agreements, installation, pre-positioning, or coordination for strategically located wildfire water infrastructure.

The evaluation should recognize that wildfire risk reduction includes not only measures intended to **prevent ignition**, but also reasonable measures intended to **reduce the probability that an ignition becomes a large or catastrophic wildfire and to reduce the consequences of a wildfire once ignition occurs**. Strategically located and rapidly accessible water supplies can therefore constitute a complementary mitigation measure when they demonstrably increase suppression capability, improve initial-attack effectiveness, provide redundant firefighting water supply, or protect communities and electric infrastructure.

Wildfire water-resource investments should supplement, rather than replace, vegetation management, system hardening, covered conductor, undergrounding, inspection, situational awareness, operational controls, PSPS, and other established wildfire mitigation measures. The ITO should prioritize projects according to demonstrated risk reduction, operational effectiveness, cost effectiveness, geographic need, public-safety benefit, and coordination with the fire agencies responsible for wildfire response.

12.3.3 Coordination with Public Safety Partners

The ITO should coordinate wildfire water-resource planning with CAL FIRE, local fire departments and fire protection districts, water agencies, local governments, emergency management agencies, and other appropriate public safety partners. Coordination should identify priority locations where additional or redundant water availability could materially improve wildfire response.

This planning should be incorporated, where appropriate, into the ITO's existing emergency preparedness and external collaboration processes and into local and regional wildfire mitigation planning. The objective is to establish a **layered wildfire risk-reduction system in which ignition prevention, utility system hardening, situational awareness, emergency response, and strategically available suppression water operate together to reduce wildfire probability, severity, consequences, and community risk.**

This addition fits especially well after **12.2.2**, because that section already requires collaboration with communities on wildfire mitigation plans, CWPPs, and multihazard mitigation plans. It also builds directly on Chapter 12's requirement for coordination with fire, OES, municipal governments, Energy Safety, CPUC, and other public-safety partners.

I deliberately framed the language around **risk reduction rather than simply firefighting support**. That makes the stronger regulatory argument: for an IOU/ITO, strategically available suppression water can be treated as a complementary mitigation investment because it addresses the **consequence and escalation side of wildfire risk**, while conventional WMP measures primarily address ignition probability and exposure.